

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop N2-20-16
Baltimore, Maryland 21244-1850



Office of Strategic Operations and Regulatory Affairs/Freedom of Information Group

Refer to: Control Number 101620187075 and PIN Z7RV

RE: 18-cv-3010-TNM

4/16/2019

Alantris Muhammad
Service Employees International Union
1800 Massachusetts Avenue, NW
Washington, DC 20036

Dear Ms. Muhammad:

This letter is the first interim response to your Freedom of Information Act (5 U.S.C. § 552) request of 10/12/2018, which you sent to the Centers for Medicare & Medicaid Services. Within your correspondence, you requested access to the following records:

1. All records reflecting communications (including emails, email attachments, text messages, Slack messages, encrypted messages, telephone call logs, calendar invitations/entries, meeting notices, meeting agendas, informational material, draft legislation, talking points, any handwritten or electronic notes taken during any responsive communications, summaries of any responsive communications, or other materials) between: (a) Seema Verma, (b) Tim Hill, (c) Kristin Fan, (d) Janel Freeze, (e) Jeremy Silanskis, (f) Christopher Thompson; and any of the following entities or individuals:

- Freedom Foundation:
 - Including Maxford Nelsen, or
 - Individuals using emails ending in @freedomfoundation.com
- National Right to Work Legal Defense Foundation
 - William L. Messenger, or
 - Individual using emails ending in @nrlw.org
- State Policy Network
 - Including F. Vincent Vernuccio, Jennifer Butler, Jeremy Lott, or
 - Individuals using emails ending in @spn.org
- Illinois Policy Institute
 - Including Kristina Rasmussen, or
 - Individuals using emails ending in @illinoispolicy.org
- Mackinac Center for Public Policy

- Including Michael Reitz, or
 - Individuals using emails ending in@mackinac.org
- Capital Research Center
 - Including individuals using emails ending in @capitalresearch.org
- Free State Foundation
 - Including individuals using emails ending in @freestatefoundation.org
- Maciver Institute
 - Including individuals using emails ending in @maciverinstitute.com
- (Center of the) American Experiment
 - Including Kim Crockett, or
 - Individuals using emails ending in @americanexperimentl.org
- Office of Gov. Bruce Rauner
 - Including individuals using emails ending in @illinois.gov
- Rep. Cathy McMorris Rodgers or staff working for Rep. McMorris Rodgers
- Sen. Ron Johnson or staff working for Senator Johnson's personal office or on the Homeland Security and Government Affairs Committee.
- Mitchell Law PLLC or Jonathan F. Mitchell

2. All records reflecting communications (including emails, email attachments, text messages, slack messages, encrypted messages, telephone call logs, calendar invitations/entries, meeting notices, meeting agendas, informational material, draft legislation, talking points, any handwritten or electronic notes taken during any responsive communications, summaries of all responsive communications, or other materials) to, from, or copying (a) Seema Verma, (b) Tim Hill, (c) Kristen Fall, (d) Janel Freeze, (e) Jeremy Silanskis, or (f) Christopher Thompson; that contain any of the following terms:

- SEIU
- 775
- skim
- Dues
- * Protect providers*
- Harris v. Quinn
- Harris v. Quinn
- Janus
- "Union dues"
- "Home care dues"
- "Dues guidance"
- "Dues rule"
- Reassignment
- "Home care workers"
- Pam Harris
- Steven Glossip
- Rob Haynes
- Pat Haynes

- Catherine Hunter
- Jennifer Parrish
- Brad Boardman
- Rosella Home
- Sandra LaCelle
- Ben Olsen
- Tammy Olsen
- Mary Jane Olson
- Michelle Peterson
- Miranda Thorpe

After careful review of the documents submitted to me and processed for this first interim response, a total of 1,951 pages, I have determined to release them to you, as enclosed. One thousand and forty-two (1,042) pages are released to you in their entirety. However, I am denying you access to portions of 172 pages pursuant to Exemptions 5 and/or 6 of the FOIA (5 U.S.C. §§ 552(b)(5) and/or (6)). Finally, an additional 737 pages are denied in full pursuant to Exemption 5 of the FOIA (5 U.S.C. § 552(b)(5)).

Exemption 5 of the FOIA permits the withholding of inter-agency or intra-agency memorandums or letters that would not be available by law to a party in litigation with the agency.

Exemption 6 of the FOIA permits a Federal agency to withhold information contained in personnel and medical files and similar files the disclosure of which would “constitute a clearly unwarranted invasion of personal privacy.” I have weighed the public interest in disclosure (which the Supreme Court has held to be limited in this context to the public interest that would be served by shedding light in the agency’s performance of its statutory duties) against the harm to the privacy of the individuals identified in these records and have concluded that the privacy interest of the subject individuals outweighs the public interest in disclosure in this particular matter.

Sincerely yours,



Hugh Gilmore
Director

Freedom of Information Group

Enclosure

From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: AM PPR NPRM Comment Tracking Log Final (9-26-18).xlsx
Date: Wednesday, September 26, 2018 4:17:30 PM
Attachments: [AM PPR NPRM Comment Tracking Log Final \(9-26-18\).xlsx](#)

Hey Chris,

I just uploaded my Comment Tracker with the uploaded comments from Hamilton's list. I also attached it here just in case there were any problems with SharePoint.

Thanks,

Asher

Final # of Posted Comment (Last 4 digits of the Document ID/Pivot Comment)	Attachment?	Author First Name	Author Last Name	Location (State/ Province)	Organization
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6078	No	N/A	N/A	Multiple	Write-in Campaign: CA, IL, MI, MA, OK
484	No	N/A	N/A	CA	Write-in Campaign: CA

0484- 2106D	No	Timothy	Vondersaar	CA	Write-in Campain: CA
2574	Yes	Corinne	Eldridge	CA	California Long Term Care Education Center
2574					
2574					

2574

2574

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2906	No	Christopher	Buckley	WA	N/A
2523	No	Bevill	Brown	TN	N/A
2904	No	Cindy	Bills	MN	Cindy's House
5488	No	Leonore	Sheridan	CA	N/A
5488					
5488					

5488

5488

6243	No	Mark	Wesel	NY	N/A
6783	No	Victor	Imparato	NY	N/A
2396	No	Nick	Gebhart	AZ	N/A
2771	No	Michael	Ashbrook	MI	N/A
2873	No	William	Hodges	OK	N/A
3811	No	Stewart	Wilber	CA	N/A
3811					

3811

3811

3811

5340	Yes	Pearl	Gonzalez	CA	N/A
5865	No	Jerry	Walling	TX	N/A

6056	Yes	Connie	Barker	CA	N/A
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6056

6056

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6364	No	Leo	Longtin	AZ	N/A
6545	No	Cecelia	Griffin	DC	N/A

Form Letter?	Total # Duplicate Comments	Duplicate matches Pivot Comment?	In Support (1 = Yes) (0 =No)	In Opposition (1 = Yes) (0 =No)	Impact on Self-Direct Service Models
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Y	53	Y	0	1	0
Y	14	Y	0	1	0

Y	0	Y	0	1	0
No	5	Yes	0	1	Yes
	0		0	0	
	0		0	0	

0	0	0
0	0	0
0	0	0

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	0		0	0	
	0		0	0	
No	5	Yes	0	1	No
No	4	Yes	1	0	No
No	3	Yes	1	0	No
No	3	Yes	0	1	No
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	0		0	0	
	0		0	0	
	0		0	0	
	0		0	0	
No	3	Yes	1	0	No
No	3	Yes	1	0	No
No	2	Yes	1	0	No
No	2	Yes	1	0	No
No	2	Yes	1	0	No
No	2	Yes	0	1	No
	0		0	0	
	0		0	0	
	0		0	0	
	0		0	0	
No	2	Yes	0	1	No
No	2	Yes	1	0	No
No	2	Yes	0	1	No
	0		0	0	
	0		0	0	
	0		0	0	
No	2	Yes	1	0	No
No	2	Yes	1	0	No

Special Considerations (if applicable)	Special Codes: Outside Organization/Individual - 1 Provider Advocacy Group - 2 Political- 3
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1
1

Detrimental to contractors: This proposed rule affects paychecks for services rendered, not Medicaid payments, unfairly limiting how workers spend their own pay. Eliminating the convenience of payroll deduction creates an unnecessary hardship for home care workers who do not report to a central worksite, may work at an opposite end of their state from union office, or do not have a credit card or bank account. Also, I see very little difference between having union dues taken out of paychecks and taxes taken out of paychecks. It is a convenience not a rule so the only reason to make it illegal is to harm unions themselves.

1

Rule would harm patients
Rule would harm workers
Undermines unions

2

Section 1902(a)(32) was passed to prevent providers from selling accounts receivables at a discount to private entities for the purpose of "factoring," or submitting false or inflated claims to the federal government, not to prevent union dues and benefits from being taken out of individual providers' pay. Will have a negative impact on HCBS and consumer directed care
Undermines consumer directed care system

Administratively burdensome if Rule is changed	
30 day comment period unfair	
CMS failed to conduct an analysis of the impact of the proposed actio	
Will create further homecare	
worker workforce shortages	
Pro-union	1
N/A	1
N/A	1
Pro-union	1
Undermines unions	
Overreach of CMS authority	
Administratively burdensome if Rule	
is changed	
Afraid will lose insurance coverage	
Stop dues skimming	1
N/A	1
Stop dues skimming	1
Stop dues skimming	1
Stop dues skimming	1
Afraid will lose insurance coverage	1
Undermines unions	
Administratively burdensome if Rule	
is changed	
Disproportionately impacts women and people of color.	
Providers should have choice of voluntary deductions	
Government shouldn't tell us how to	1
Stop dues skimming	1
Administratively burdensome if Rule	
is changed	1
Government shouldn't tell us how to	
spend our own money	
First amendment right to support	
unions	
Undermines unions	
N/A	1
N/A	1

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Final # of Posted Comment (Last 4 digits of the Document ID)	Attachment?	Author First Name	Author Last Name	Location (State/ Province)	Organization	Form Letter?
4963	Yes	Nanette	Jafri	OR	N/A	No
4963						
4968	Yes	Susan	Justice	OR	N/A	No
4975	Yes	Winifred	Shafer	MT	N/A	No
4979	Yes	Earlene	Webster	WA	N/A	No
4979						
4985	No	Larry	Brown	WA	N/A	No
5049	Yes	N/A	N/A	CA	Pacific Legal Foundati	No
5059	No	Sandra	Dahlquist	WA	N/A	No
5064	Yes	N/A	N/A	OR	Oregon State Council	No
5064						
5080	No	Teri	Kraslavsky	CA	N/A	No
5080						
5080						
5124	No	Rusty	Brown	MN	MNPCA	Yes
5128	No	Anonymous	Anonymous	WA	N/A	No
5130	No	Anonymous	Anonymous	MN	MNPCA	Yes
5133	No	Cheryl	Young	MN	MNPCA	Yes
5138	No	Anonymous	Anonymous	MN	MNPCA	Yes
5140	No	David	Vigen	WA	N/A	No
5141	No	Anonymous	Anonymous	MN	MNPCA	Yes
5141						Yes
5143	No	Hollee	Hembree	MN	MNPCA	Yes
5145	No	Janine	Yates	MN	MNPCA	Yes
5146	No	Jocelyn	Kraemer	MN	MNPCA	Yes
5149	No	Edna	Kell	OR	N/A	No
5150	No	Justin	Owen	TN	Beacon Center of Ten	No
5151	No	Anonymous	Anonymous	MN	MNPCA	Yes
5153	No	Marty	Welty	MN	MNPCA	Yes
5155	No	Pam	Olsen	MN	MNPCA	Yes
5161	Yes	Dante	Vitale	CA	N/A	No
5162	No	Patricia	Johansen	MN	MNPCA	Yes
5165	No	Sheryol	Emery	MN	MNPCA	Yes
5168	Yes	Desharna	Johnson	CA	N/A	No
5169	No	Sara	Madill	MN	MNPCA	Yes
5172	Yes	Dinah	Thao	CA	N/A	No
5172						
5173	Yes	Adriana	Mendoza de Pen	CA	N/A	No
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5174	No	Anonymous	Anonymous	MN	MNPCA	Yes

5176	Yes	Alice	Lawson	CA	N/A	No
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5178	No	Anonymous	Anonymous	MN	MNPCA	Yes
5179	Yes	Alma	Delgado	CA	N/A	No
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5180	Yes	Efigenia	Galvan	CA	N/A	No
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5180						
5182	No	Emily	Polar	MN	MNPCA	Yes
5184	Yes	Alva	Rodriguez	CA	No	No
5184						
5185	No	Sylvia	Mcguire	MN	MNPCA	Yes
5186	Yes	Elba	Ruiz	CA	N/A	No
5186						
5190	Yes	Frank	Chopp	WA	N/A	No
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5202	Yes	Jim	Abeler	MN	N/A	No
5204	Yes	Ellen	Green	CA	N/A	No
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5206	Yes	Angelina	Aleman	CA	N/A	No
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5207	Yes	Enrique	Camacho	CA	N/A	No
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5208	Yes	Anastasia	Melnicenco	CA	N/A	No
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5209	Yes	Anthony	Coleman	CA	N/A	No
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5210	Yes	Erma	Polar	CA	N/A	No
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5214	Yes	Arianna	Garland	CA	N/A	No
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5217	Yes	Gloria	Echevarria	CA	N/A	No
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5218	No	Willard	Gibbs	WA	N/A	No
5221	Yes	Barbara	Bondurant	CA	N/A	No
5221						
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5223	Yes	Gabriella	Ruiz	CA	N/A	No
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5224	Yes	Beronica	Batuista	CA	N/A	No

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5226	Yes	Bonita	Munoz	CA	N/A	No
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5227	Yes	Bradley	Wiedmaier	CA	N/A	No
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5228	Yes	Gum	Leung	CA	N/A	No
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5230	Yes	Brittany	Williams	CA	N/A	No
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5231	Yes	Herminia	Maravilla	CA	N/A	No
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5232	Yes	Camille	Christian	CA	N/A	No
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5235	Yes	Holly	Hickenbottom	CA	N/A	No
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5238	Yes	Hripsime	Tamazyan	CA	N/A	No
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5239	Yes	Irma	Recinos	CA	N/A	No
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5240	Yes	Carmen	Pastran	CA	N/A	No
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5243	Yes	Carol	Thomas	CA	N/A	No
5243						
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5245	Yes	Jaqueline	Edwards	CA	N/A	No
5245						
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5247	Yes	Cecili	Hu	CA	N/A	No
5247						
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5250	Yes	Janet	Lopez	CA	N/A	No
5250						
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5250						
5251	Yes	Janice	Love	CA	N/A	No

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5253	Yes	Jeffrey	Nary	CA	N/A	No
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5255	Yes	Jennifer	Turner	CA	N/A	No
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5256	Yes	Cely	Inda	CA	N/A	No
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5257	Yes	Jimmy	Flores	CA	N/A	No
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5258	Yes	Cenia	Peters	CA	N/A	No
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5261	Yes	Cheryl	Garland	CA	N/A	No
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5262	Yes	Debra	Hunt	CA	N/A	No
5263	Yes	Cheryl	Stubbs	CA	N/A	No
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5264	Yes	Jocelyn	Sanders	CA	N/A	No
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5268	Yes	Chue	Berriel	CA	N/A	No
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5269	Yes	Chuck	Weaver	WA	N/A	No
5270	Yes	Jooana	Amiryan	CA	N/A	No
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5271	Yes	Cindy	Raheem	CA	N/A	No
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5273	Yes	Josefina	Ramirez	CA	N/A	No
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5275	Yes	Cerenia	Torres	CA	N/A	No
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5277	Yes	Cozette	Miller	CA	N/A	No
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5279	Yes	Joseph	Franco	CA	N/A	No
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5282	Yes	Juanita	Chavez	CA	N/A	No
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5284	Yes	Judy	Han	CA	N/A	No
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5286	Yes	Marguerite	Johnson	CA	N/A	No
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5288	Yes	Maria	Alvarez	CA	N/A	No
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5291	Yes	Maria	Arreola	CA	N/A	No
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5295	Yes	Maria	Benitez	CA	N/A	No
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5296	Yes	Julie	Chow	CA	N/A	No
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5297	Yes	Maria	Cibrian	CA	N/A	No
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5298	Yes	Maria	Delgado	CA	N/A	No
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5301	Yes	Maria	Lopez	CA	N/A	No
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5302	Yes	Maria	Hernandez	CA	N/A	No
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5305	Yes	Keyoun	Walters	CA	N/A	No
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5307	Yes	Maria Patricia	Hernandez	CA	N/A	No
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5308	Yes	Maria	Valdez	CA	N/A	No
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5308						
5309	No	Lillie	Peterson	WA	N/A	No
5310	Yes	Khachatoor	Gharapetian	CA	N/A	No
5310						

5310						
5312	Yes	Mary	Aparicio	CA	N/A	No
5312						
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5315	Yes	Kim	Ballon	CA	N/A	No
5315						
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5316	Yes	Marylou	Angel	CA	N/A	No
5316						
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5317	Yes	Michelle	Reed	CA	N/A	No
5317						
5317						
5319	Yes	Mina	Serrano	CA	N/A	No
5319						
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5320	Yes	Kwangja	Shin	CA	N/A	No
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5323	Yes	Leonard	Camerina	CA	N/A	No
5323						
5324	Yes	Lesia	Luoro	CA	N/A	No
5324						
5324						
5325	Yes	Nicolasa	Arevalo	CA	N/A	No
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5326	Yes	Nicole	Neff	CA	N/A	No
5326						
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5327	Yes	Leslie	Williams	CA	N/A	No
5327						
5328	Yes	Norma	Zelaya	CA	N/A	No
5328						
5328						
5329	Yes	Greg	Smith	OR	N/A	No
5329						
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5330	Yes	Olga	Evans	CA	N/A	No

5330						
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5332	Yes	Patrice	Brown	CA	N/A	No
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5333	Yes	Nadine	Moore	CA	N/A	No
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5337	Yes	Patricia	Bryson	CA	N/A	No
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5338	Yes	Patricia	Santana	CA	N/A	No
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5339	Yes	Patricia	Watkins	CA	N/A	No
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5339						
5341	Yes	Petra	Payan	CA	N/A	No
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5350	No	K	M	WA	N/A	No
5351	Yes	Rachelle	Lewis	CA	N/A	No
5351						
5351						
5351						
5355	No	Diantha	Doucette	WA	N/A	No
5356	No	Thomas	Holman	OH	N/A	No
5356						
5358	Yes	Roberto	Rodriguez	CA	N/A	No
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5361	Yes	Karla	Walter	DC	Center for American F	No
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5362	Yes	Sandra	Medina	CA	N/A	No
5362						

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5363	No	Fabiola	Kocks	WA	N/A	No
5365	Yes	Sarah	Esqueda	CA	N/A	No
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5366	Yes	Scott	Temple	CA	N/A	No
5366						
5368	Yes	Sharie	Washington	CA	N/A	No
5368						
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5371	Yes	Sharron	McNeil	CA	N/A	No
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5374	No	Sandi	Caldrone	IN	N/A	No
5375	No	Frederick	Brinbaum	ID	Idaho Freedom Founc	No
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5378	Yes	Sheri	Perez	CA	N/A	No
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5380	Yes	Sonja	Krantz	CA	N/A	No
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5381	No	Larry	Ratts	WA	N/A	No
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5382	No	Suk	Kim	CA	N/A	No
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5383	No	Dave	R.	WA	N/A	No
5384	No	Susan	Baber	CA	N/A	No
5384						
5388	No	Don	Bliss	CA	N/A	No
5389	No	Tim	McMahon	WA	N/A	No
5399	Yes	Tim	Foley	MA	Service Employees Int	No
5399						
5399						
5399						
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5399						
5399						
5399						
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5401	No	Shannon	Hensley	WA	N/A	No
5401						
5410	No	Tom	Harrison	OR	N/A	No
5410						
5411	No	Kathryn	Jackson	WA	N/A	No
5418	No	Charles	Noll	OR	N/A	No
5418						
5423	No	Gregory	Kelley	IL	Service Employees Int	No
5423						
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5431	Yes	Amber	Smock	IL	Access Living	No
5431						
5431						
5432	Yes	Jackie	Simila	OR	N/A	No
5433						
5436	No	Robin	Elenga	WA	N/A	No
5439	No	Scott	Samuelson	WA	N/A	No
5441	No	Tammi	Stewart	WA	N/A	No
5441						
5441						
5445	No	Cathy	Lindsay	WA	N/A	No
5446	Yes	Theresa	Hindsman	CA	N/A	No
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5448	Yes	Thomas	Xiong	CA	N/A	No
5448						
5449	No	Mary	Louie	WA	N/A	No
5449						
5450	Yes	Tiffany	Mays	CA	N/A	No
5450						
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5452	Yes	Tiffany	Smith	CA	N/A	No
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5457	Yes	Tracy	Mills	CA	N/A	No
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5459	Yes	Yi	Gao	CA	N/A	No
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5459						
5460	Yes	Yueh Pi	Chang	CA	N/A	No
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5462	Yes	Yvette	Square	CA	N/A	No
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5463	Yes	Zaraf	Ali	CA	N/A	No
5463						
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5466	No	N/A	N/A	MA	1199SEIU	No
5476	No	Rosemary	Graham-Gardner	CA	N/A	No
5477	No	Terrence	Richards	CA	N/A	No
5477						
5477						
5478	No	Anonymous	Anonymous	WA	SEIU775	No
5479	No	Casey	Directo	CA	N/A	No
5483	No	Elizabeth	Dodd	WA	N/A	No
5489	No	Tedene	Myrick	WA	N/A	No
5491	No	C. Dean	Hobson	WA	N/A	No
5492	No	Donald	Eden	WA	N/A	No
5496	No	Christine	Seboe	WA	N/A	No
5502	No	Anonymous	Anonymous	WA	N/A	No
5505	No	Anonymous	Anonymous	WA	N/A	No
5506	No	Joann	Norton	VA	N/A	No
5509	No	Karen	Conchar	VA	N/A	No
5512	No	Anonymous	Anonymous	WA	SEIU775	No
5517	No	Martha	Dickerson	WA	N/A	No
5535	Yes	Richard	Yrjanson	WA	N/A	No
5545	No	Anonymous	Anonymous	MN	PCA	No
5546	No	Anonymous	Anonymous	MN	PCA	No
5548	No	Maria	Kalugin	OR	Self Motion	No
5563	No	Anonymous	Anonymous	WA	N/A	No
5577	No	Carolyn	Haines	CA	N/A	No
5577						
5579	No	Margaret	Sharpan	CA	N/A	No
5601	No	Khadiga	Ahmend	CA	N/A	No
5610	No	Bradley	Boardman	WA	N/A	No
5611	No	Vibinna	Saavedra	CA	N/A	No
5612	No	Ruby	Grayes	CA	N/A	No
5612						
5613	No	Laurie	Shaw	MN		1956 No
5614	No	Anonymous	Anonymous	MN	N/A	No
5615	No	Dian	Nicholson	CA	N/A	No
5616	No	Allene	Villa	CA	N/A	No
5616						
5617	No	Silvia	de Grijalva	CA	AFSCME/UDW Local 3	No

5618	No	Josh	W	MN	N/A	No
5622	No	Rosita	Whittaker	CA	N/A	No
5625	No	Margaret	Edwards	CA	N/A	No
5625						
5628	No	Jennifer	Parish	MN	N/A	No
5631	No	Sue	Hilton	CA	N/A	No
5633	No	Karen	Blaine	MN	N/A	No
5637	No	Melody	Beale-Garcia	CA	N/A	No
5644	Yes	Lori	Smetanka	DC	National Consumer V	No
5644						
5644						
5645	No	Susan	Smolski	WA	N/A	No
5653	Yes	Craig	Becker	DC	AFL-CIO	No
5653						
5653						
5653						
5653						
5653						
5664	No	Ana	Bodin	WA	N/A	No
5665	No	Anonymous	Anonymous	MN	N/A	No
5667	No	A	Jensen	WA	N/A	No
5679	No	Cheryl	White	CA	IHSS of Riverside Cou	No
5680	No	Catherine	Rose	CO	N/A	No
5682	No	Russel	Brown	FL	CIE	No
5684	No	Christopher	Lish	CA	N/A	No
5684						
5684						
5684						
5684						
5687	No	Aundrea	Montenegro	CA	N/A	No
5688	No	Catherine	Montenegro	CA	N/A	No
5688						
5689	No	Leslie	Lofton	CA	N/A	No
5690	No	Tanisha	Crane	CA	N/A	No
5690						
5690						
5691	No	Regina	Coleman	CA	N/A	No
5691						
5691						
5692	No	Spryng	Duggan	CA	N/A	No
5692						
5693	No	Santiago	Sada	CA	N/A	No
5693						
5694	No	Marlett	Vizcarra	CA	N/A	No

5694						
5696	No	Francis	Sanchez	CA	N/A	No
5698	No	Maria	Hernandez	CA	N/A	No
5699	No	Daniel	Osuna	CA	N/A	No
5699						
5699						
5699						
5700	No	En	Wergin	CA	N/A	No
5701	No	Beatriz	Galvan	CA	N/A	No
5702	No	Linda	Rodriguez	CA	N/A	No
5703	No	Maria	Roach	CA	N/A	No
5732	No	James	Deller	WA	N/A	No
5733	No	Kim	Stern	MN	N/A	No
5741	No	Caroline	Harding	WA	N/A	No
5742	No	Yvonne	Slenning	WA	N/A	No
5743	No	Patti	Peery	WA	N/A	No
5748	Yes	Lephonza	Butler	CA	N/A	No
5748						
5748						
5748						
5748						
5748						
5748						
5748						
5752	Yes	Rosario	Cabrera	MA	N/A	No
5752						
5752						
5752						
5754	Yes	Milika	Exantus	MA	N/A	No
5754						
5754						
5755	No	James	Normal	WA	N/A	No
5756	Yes	Melody	Benjamin	IL	N/A	No
5756						
5756						
5756						
5757	Yes	Paralee	Stewart	IL	N/A	No
5757						
5757						
5762	No	Beth	Brummer	MN	N/A	No
5765	No	David	Rolf	WA	SEIU775	No
5765						
5765						
5765						
5765						
5765						

5766	No	Germaine	Williams	MN	N/A	No
5768	No	Carol	Shetler	WA	N/A	No
5771	No	Donn	Shetler	WA	N/A	No
5778	No	Brett	Odom	VA	Azimuth	No
5781	Yes	William	Messenger	VA	National Right to Wor	No

5815

6519						
6519						
6519						
6519						
6520	No	Leo	Epp	NE	N/A	No
6521	No	L.	Mersh	VA	N/A	No
6522	No	Dorothy	Hall	TN	N/A	No
6524	No	Dawn	Ray	AL	N/A	No
6527	No	Lori	Higgins	IN	N/A	No
6528	No	Larry	Schillinger	MO	N/A	No
6529	No	Elissa	McAlear	CO	N/A	No
6531	No	Cheryl	Little	AZ	N/A	No
6532	Yes	Christopher	Summers	MD	The Maryland Public I	No
6533	No	Robert	Johnson	AZ	N/A	No
6535	No	Aretta	Moses	KY	N/A	No
6536	No	Glenn	Hamilton	FL	N/A	No
6537	No	Rodney	Crites	MI	N/A	No
6538	No	Ernst	Hall	FL	N/A	No
6539	No	Harry	Palmer	WA	N/A	No
6540	No	Daniel	Mauter	WI	N/A	No
6541	No	Anthony	Wright	CA	Health Access Califorr	No
6543	No	F	Manzanares	CO	N/A	No
6544	No	Charles	Sisson	UT	N/A	No
6546	No	Florie	Hintzie	HI	N/A	No
6547	No	King	Goulet	IA	N/A	No
6548	No	Lonnie	Carter	KS	N/A	No
6549	No	John	George	AR	N/A	No
6550	No	David	Cardenas	AZ	N/A	No
6551	No	Michael	Hubbard	IL	N/A	No
6552	No	Cheryl	Baeufait	FL	N/A	No
6553	No	Darrel	Fellhauer	NV	N/A	No
6554	No	Phillip	Barnhill	KY	N/A	No
6556	No	Tina	Burge	CO	N/A	No
6557	No	Brian	Patterson	FL	N/A	No
6558	No	Richard	Boneno	LA	N/A	No
6560	No	Larry	Hyak	CA	N/A	No
6562	No	Mike	Nearman	OR	Oregon State Represe	No
6563	No	Jennifer	Hanney	VA	N/A	No
6564	No	Theresa	Jones	TX	N/A	No
6565	No	Michael	Thompson	VA	Thomas Jefferson Inst	No
6566	No	Andrew	Lopez	TX	N/A	No
6567	No	Glenn	Munoz	TX	N/A	No
6568	No	James	Gardner	VA	N/A	No
6569	No	Tracie	Sharp	VA	State Policy Network	No
6570	No	Herbert	Parker	FL	N/A	No
6571	No	Elizabeth	Gunderson	AZ	N/A	No
6573	No	Paul	Tonder	FL	N/A	No

6575	No	Roger	Durham	IN	N/A	No
6576	No	Dave	Jordan	MI	N/A	No
6577	No	David	Barnes	ME	N/A	No
6578	No	Mark	Jeric	NV	N/A	No
6579	No	Cherlyn	Akerly	CO	N/A	No
6581	No	T	Mckissack	TX	N/A	No
6584	No	Nancy	Pomish	MI	N/A	No
6585	No	Patrick	Swafford	VA	N/A	No
6586	No	Stephanie	Van campen	GA	N/A	No
6588	No	Robert	Buszka	TN	N/A	No
6589	No	Jim	Bingham	NM	N/A	No
6591	No	Mary Jane	Olson	WA	N/A	No
6592	No	Sharon	Groth	SC	N/A	No
6594	No	Marty	Larsen	CO	N/A	No
6595	No	Peter	McCarthy	NY	N/A	No
6596	No	Sharon	Gutierrez	TX	N/A	No

Total # Comments/ Signatures	Duplicate?	In Support (1 = Yes) (0 =No)	In Opposition (1 = Yes) (0 =No)	Impact on Self-Direct Service Models	Special Considerations (if applicable)
1	No		0	1 No	Disproportionately impacts women a
0			0	0	Administratively burdensome if Rule
1	No		0	1 No	Undermines unions
1	No		0	1 No	Undermines unions
1	No		0	1 No	Undermines unions
0			0	0	Will lose insurance coverage
1	No		0	1 No	Undermines unions
2	No	1		0 No	Violates First Amendment
1	No	1		0 No	Illegally taking dues from pay
1	No	0		1 No	Reduces number of people receiving
0		0		0	Undermines unions
1	No	0		1 No	Undermines unions
0		0		0	Will lose insurance coverage
0		0		0	Disproportionately impacts women a
1	No	1		0 No	Anti-union
1	No	1		0 No	Tax dollars should not be used to coll
1	No	1		0 No	Investigate unauthorized automatic c
1	No	1		0 No	Investigate unauthorized automatic c
1	No	1		0 No	Investigate unauthorized automatic c
1	No	1		0 No	N/A
1	No	1		0 No	Investigate unauthorized automatic c
0		0		0	CMS should investigate unauthorized
1	No	1		0 No	Investigate unauthorized automatic c
1	No	1		0 No	Investigate unauthorized automatic c
1	No	1		0 No	Investigate unauthorized automatic c
1	No	1		0 No	Anti-union
1	No	1		0 No	Medicaid funds should not be diverte
1	No	1		0 No	Investigate unauthorized automatic c
1	No	1		0 No	Investigate unauthorized automatic c
1	No	1		0 No	Help address SEIU unfair practices
1	No	0		1 No	Administratively burdensome if Rule
1	No	1		0 No	Investigate unauthorized automatic c
1	No	1		0 No	Anti-union
1	No	0		1 No	Administratively burdensome if Rule
1	No	1		0 No	Anti-union
1	No	0		1 No	Administratively burdensome if Rule
0		0		0	Hurts those who don't have bank acco
1	No	0		1 No	Pro-union
0		0		0	30 day comment period unfair
1	No	1		0 No	Anti-union

1 No	0	1 No	Pro-union
0	0	0	Afraid will lose insurance coverage
0	0	0	Don't change automatic deduction
1 No	1	0 No	Investigate unauthorized automatic c
1 No	0	1 No	Administratively burdensome if Rule
0	0	0	Afraid will lose insurance coverage
0	0	0	Don't change automatic deduction
1 No	0	1 No	Administratively burdensome if Rule
0	0	0	Don't change automatic deduction
0	0	0	Afraid will lose insurance coverage
1 No	1	0 No	Stop unauthorized automatic deducti
1 No	0	1 No	Pro-union
0	0	0	First amendment right to support uni
1 No	1	0 No	Stop unauthorized automatic deducti
1 No	0	1 No	Pro-union
0	0	0	30 day comment period unfair
1 No	0	1 Yes	Undermines consumer directed care
0	0	0	May reduce qualified provider numbe
0	0	0	Providers should have choice of volur
1 No	0	1 No	Reduces state flexibility
1 No	0	1 No	Pro-union
0	0	0	First amendment right to support uni
1 No	0	1 No	Administratively burdensome if Rule
0	0	0	Pro-union
0	0	0	Afraid will lose insurance coverage
1 No	0	1 No	Administratively burdensome if Rule
0	0	0	Pro-union
1 No	0	1 No	Pro-union
0	0	0	Administratively burdensome if Rule i
1 No	0	1 No	Pro-union
0	0	0	Administratively burdensome if Rule i
1 No	0	1 No	Administratively burdensome if Rule
0	0	0	Pro-union
1 No	0	1 No	Pro-union
0	0	0	Administratively burdensome if Rule i
0	0	0	First amendment right to support uni
0	0	0	Afraid will lose insurance coverage
1 No	0	1 No	Pro-union
0	0	0	Administratively burdensome if Rule i
1 No	1	0 No	N/A
1 No	0	1 No	Violates civil rights
0	0	0	Afraid will lose insurance coverage
0	0	0	Administratively burdensome if Rule i
0	0	0	Pro-union
1 No	0	1 No	Pro-union
0	0	0	Administratively burdensome if Rule i
1 No	0	1 No	Pro-union

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1 No	0	1 No	Pro-union
0	0	0	Administratively burdensome if Rule i
0	0	0	First amendment right to support uni
0	0	0	May reduce the number of people re
1 No	0	1 No	Pro-union
0	0	0	Undermines unions
1 No	0	1 No	30 day comment period unfair
0	0	0	Pro-union
0	0	0	Providers should have choice of volur
0	0	0	Undermines unions
1 No	0	1 No	Providers should have choice of volur
0	0	0	Administratively burdensome if Rule i
0	0	0	First amendment right to support uni
0	0	0	Pro-union
0	0	0	Afraid will lose insurance coverage
1 No	0	1 No	Pro-union
0	0	0	Administratively burdensome if Rule i
0	0	0	Undermines unions
1 No	0	1 No	Pro-union
0	0	0	Undermines unions
0	0	0	Administratively burdensome if Rule i
0	0	0	Government shouldn't tell us how to
1 No	0	1 No	Administratively burdensome if Rule
0	0	0	Government shouldn't tell us how to
0	0	0	Pro-union
1 No	0	1 No	Pro-union
0	0	0	Violates civil rights
0	0	0	Government shouldn't tell us how to
1 No	0	1 No	Government shouldn't tell us how to
0	0	0	First amendment right to support uni
0	0	0	Afraid will lose insurance coverage
0	0	0	Administratively burdensome if Rule i
1 No	0	1 No	First amendment right to support uni
0	0	0	Pro-union
0	0	0	Government shouldn't tell us how to
0	0	0	Afraid will lose insurance coverage
1 No	0	1 No	First amendment right to support uni
0	0	0	Pro-union
0	0	0	Government shouldn't tell us how to
0	0	0	Don't change automatic deduction
1 No	0	1 No	First amendment right to support uni
0	0	0	Pro-union
0	0	0	Government shouldn't tell us how to
0	0	0	Don't change automatic deduction
1 No	1	0 No	N/A
1 No	0	1 No	Afraid will lose insurance coverage
0	0	0	Pro-union

0	0	0	Don't change automatic deduction
1 No	0	1 No	Pro-union
0	0	0	Government shouldn't tell us how to
0	0	0	Undermines unions
0	0	0	Administratively burdensome if Rule i
1 No	0	1 No	Government shouldn't tell us how to
0	0	0	Pro-union
0	0	0	Don't change automatic deduction
1 No	0	1 No	Government shouldn't tell us how to
0	0	0	First amendment right to support uni
0	0	0	Administratively burdensome if Rule i
0	0	0	Pro-union
1 No	0	1 No	Pro-union
0	0	0	Afraid will lose insurance coverage
0	0	0	Government shouldn't tell us how to
0	0	0	Administratively burdensome if Rule i
1 No	0	1 No	Government shouldn't tell us how to
0	0	0	Pro-union
0	0	0	Administratively burdensome if Rule i
0	0	0	Undermines unions
0	0	0	Hurts those who don't have bank acco
1 No	0	1 No	Pro-union
0	0	0	Administratively burdensome if Rule i
1 No	0	1 No	Pro-union
0	0	0	Administratively burdensome if Rule i
1 No	0	1 No	Pro-union
0	0	0	Administratively burdensome if Rule i
0	0	0	Afraid will lose insurance coverage
0	0	0	Government shouldn't tell us how to
1 No	0	1 No	Pro-union
0	0	0	First amendment right to support uni
0	0	0	Administratively burdensome if Rule i
0	0	0	Don't change automatic deduction
1 No	0	1 No	Disproportionately impacts women a
0	0	0	Pro-union
0	0	0	Administratively burdensome if Rule i
0	0	0	Undermines unions
1 No	0	1 No	Pro-union
0	0	0	Administratively burdensome if Rule i
1 No	0	1 No	Pro-union
0	0	0	Government shouldn't tell us how to
0	0	0	First amendment right to support uni
0	0	0	Administratively burdensome if Rule i
1 No	0	1 No	Pro-union
0	0	0	Providers should have choice of volur
0	0	0	Violates civil rights
1 No	0	1 No	Government shouldn't tell us how to

0	0	0	Pro-union
0	0	0	May reduce the number of people re
1 No	0	1 No	Government shouldn't tell us how to
0	0	0	Pro-union
0	0	0	First amendment right to support uni
0	0	0	Administratively burdensome if Rule i
1 No	0	1 No	Pro-union
0	0	0	Administratively burdensome if Rule i
0	0	0	Government shouldn't tell us how to
1 No	0	1 No	Pro-union
0	0	0	May reduce the number of people re
0	0	0	Administratively burdensome if Rule i
0	0	0	Afraid will lose insurance coverage
1 No	0	1	Pro-union
0	0	0	Afraid will lose insurance coverage
0	0	0	Administratively burdensome if Rule i
0	0	0	Government shouldn't tell us how to
1 No	0	1 No	May reduce the number of people re
0	0	0	Pro-union
0	0	0	First amendment right to support uni
0	0	0	Administratively burdensome if Rule i
1 No	0	1 No	Pro-union
0	0	0	Administratively burdensome if Rule i
1 No	1	0 No	Anti-union
1 No	0	1 No	Pro-union
0	0	0	Government shouldn't tell us how to
0	0	0	Afraid will lose insurance coverage
0	0	0	First amendment right to support uni
0	0	0	Administratively burdensome if Rule i
1 No	1	0 No	Providers should have choice of volur
1 No	0	1 No	May reduce the number of people re
0	0	0	May reduce qualified provider numbe
1 No	0	1 No	Pro-union
0	0	0	Administratively burdensome if Rule i
0	0	0	First amendment right to support uni
0	0	0	Government shouldn't tell us how to
1 No	0	1	Disproportionately impacts women a
0	0	0	Rule would harm patients
0	0	0	May reduce qualified provider numbe
0	0	0	Pro-union
0	0	0	Rule would harm workers
0	0	0	Administratively burdensome if Rule i
0	0	0	Undermines unions
0	0	0	30 day comment period unfair
0	0	0	Does not violate Social Security Act
1 No	0	1 No	Government shouldn't tell us how to
0	0	0	Pro-union

0	0	0	Administratively burdensome if Rule i
1 No	1	0 No	Pro-union
1 No	0	1 No	Pro-union
0	0	0	Government shouldn't tell us how to
0	0	0	First amendment right to support uni
1 No	0	1 No	Pro-union
0	0	0	Administratively burdensome if Rule i
0	0	0	Don't change automatic deduction
1 No	0	1 No	Pro-union
0	0	0	Government shouldn't tell us how to
0	0	0	Don't change automatic deduction
0	0	0	Administratively burdensome if Rule i
1 No	0	1 No	Pro-union
0	0	0	Government shouldn't tell us how to
0	0	0	Administratively burdensome if Rule i
1 No	0	1 No	N/A
1 No	1	0 No	Medicaid funds should not be diverte
0	0	0	Providers should have choice of volur
0	0	0	Tax dollars should not be used to coll
1 No	0	1 No	Administratively burdensome if Rule
0	0	0	Pro-union
0	0	0	30 day comment period unfair
1 No	0	1 No	Administratively burdensome if Rule
0	0	0	Pro-union
0	0	0	Afraid will lose insurance coverage
0	0	0	Government shouldn't tell us how to
2 No	1	0 No	Pro-union
0	0	0	Providers should have choice of volur
1 No	0	1 No	Pro-union
0	0	0	Administratively burdensome if Rule i
0	0	0	Afraid will lose insurance coverage
0	0	0	Don't change automatic deduction
1 No	1	0 No	Providers should have choice of volur
1 No	0	1 No	Pro-union
0	0	0	Government shouldn't tell us how to
1 No	0	1 No	Providers should have choice of volur
1 No	0	1 No	N/A
1 No	0	1 Yes	Does not violate Social Security Act
0	0	0	Afraid will lose insurance coverage
0	0	0	Pro-union
0	0	0	Disproportionately impacts women a
0	0	0	Hurts those who don't have bank acc
0	0	0	Undermines consumer directed care :
0	0	0	The regulation conflicts with the Nati
0	0	0	Section 1902(a)(32) was passed to pr
0	0	0	30 day comment period unfair
0	0	0	Undermines unions

1 No	1	0 No	Providers should have choice of volur
0	0	0	Anti-union
1 No	1	0 No	Anti-union
0	0	0	Stop unauthorized automatic deducti
1 No	1	0 No	Anti-union
1 No	1	0 No	Providers should have choice of volur
0	0	0	Governments should not be in the bu
1 No	0	1 Yes	Afraid will lose insurance coverage
0	0	0	Pro-union
0	0	0	May reduce the number of people re
0	0	0	May reduce qualified provider numbe
0	0	0	Rule would harm workers
0	0	0	Rule would harm patients
0	0	0	First amendment right to support uni
0	0	0	CMS failed to conduct an analysis of t
0	0	0	Administratively burdensome if Rule i
0	0	0	Hurts those who don't have bank acco
0	0	0	No evidence that consumers or provi
0	0	0	30 day comment period unfair
1 No	0	1 No	First amendment right to support uni
0	0	0	May reduce the number of people re
0	0	0	Rule would harm patients
1 No	0	1 No	Pro-union
0	0	0	May reduce qualified provider numbe
1 No	1	0 No	Stop dues skimming
1 No	0	1 No	N/A
1 No	0	1 No	Pro-union
0	0	0	Administratively burdensome if Rule i
0	0	0	Government shouldn't tell us how to
1 No	1	0 No	N/A
1 No	0	1 No	Pro-union
0	0	0	Administratively burdensome if Rule i
1 No	0	1 No	Government shouldn't tell us how to
0	0	0	Pro-union
1 No	1	0 No	Providers should have choice of volur
0	0	0	Stop unauthorized automatic deducti
1 No	0	1 No	Afraid will lose insurance coverage
0	0	0	First amendment right to support uni
0	0	0	Administratively burdensome if Rule i
0	0	0	Pro-union
1 No	0	1 No	Pro-union
0	0	0	Government shouldn't tell us how to
1 No	0	1 No	Government shouldn't tell us how to
0	0	0	Administratively burdensome if Rule i
0	0	0	Pro-union
1 No	0	1 No	Undermines unions
0	0	0	Pro-union

0	0	0	Administratively burdensome if Rule i
1 No	0	1 No	Pro-union
0	0	0	Administratively burdensome if Rule i
1 No	0	1 No	Government shouldn't tell us how to
0	0	0	Administratively burdensome if Rule i
0	0	0	Afraid will lose insurance coverage
1 No	0	1 No	Government shouldn't tell us how to
0	0	0	Administratively burdensome if Rule i
0	0	0	Pro-union
148 No	0	1 No	Undermines unions
1 No	0	1 No	N/A
1 No	0	1 No	Undermines unions
0	0	0	Administratively burdensome if Rule i
0	0	0	Afraid will lose insurance coverage
0	0	0	Pro-union
1 No	1	0 No	N/A
1	0	1 No	Undermines unions
1 No	1	0 No	Providers should have choice of volur
1 No	1	0 No	Anti-union
1 No	1	0 No	Providers should have choice of volur
1 No	1	0 No	Anti-union
1 No	1	0 No	N/A
1 No	1	0 No	Anti-union
1 No	1	0 No	Illegally taking dues from pay
1 No	0	1 No	Undermines unions
1 No	0	1 No	Government shouldn't tell us how to
1 No	1	0 No	Illegally taking dues from pay
1 No	1	0 No	Providers should have choice of volur
1 No	0	0 No	N/A
1 No	1	0 No	Anti-union
1 No	1	0 No	Anti-union
1 No	1	0 No	Wasn't aware union dues were used
1 No	1	0 No	Stop unauthorized automatic deducti
1 No	0	1 No	Undermines unions
0	0	0	Rule would harm patients
1 No	0	1 No	Rule would harm patients
1 No	0	1 No	Rule would harm patients
1 No	1	0 No	Illegally taking dues from pay
1 No	0	1 No	Disproportionately impacts women a
1 No	0	1 No	Rule would harm patients
0	0	0	Rule would harm workers
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	N/A
1 No	0	1 No	Administratively burdensome if Rule
1 No	0	1 No	Administratively burdensome if Rule
0	0	0	Afraid will lose insurance coverage
1 No	0	1 No	Administratively burdensome if Rule

1 No	0	1 No	Pro-union
1 No	1	0 No	Stop dues skimming
1 No	0	1 No	Administratively burdensome if Rule
0	0	0	Government shouldn't tell us how to
1 No	1	0 No	Stop dues skimming
1 No	0	1 No	Administratively burdensome if Rule
1 No	1	0 No	N/A
1 No	1	0 No	N/A
2 No	0	1 No	Undermines consumer directed care
0	0	0	Rule would harm patients
0	0	0	Rule would harm workers
0	0	0	No evidence that consumers or provi
1 No	1	0 No	N/A
2 No	0	1 No	Section 1902(a)(32) was passed to pr
0	0	0	The 2012 NPRM stated "The statutory
0	0	0	Finally, the federal courts have agree
0	0	0	Rule would harm patients
0	0	0	Rule would harm workers
0	0	0	Cost savings from collective purchasir
0	0	0	CMS is contradicting the original inter
1 No	1	0 No	Anti-union
1 No	0	1 No	CMS failed to conduct an analysis of t
1 No	1	0 No	Stop dues skimming
1 No	0	1 No	N/A
1 No	0	1 No	Don't change automatic deduction
1 No	1	0 No	Stop dues skimming
1	0	1 No	Government shouldn't tell us how to
0	0	0	Undermines unions
0	0	0	Afraid will lose insurance coverage
0	0	0	Administratively burdensome if Rule i
0	0	0	Rule would harm patients
0	0	0	Rule would harm workers
1 No	0	1 No	Rule would harm patients
1 No	0	1 No	Undermines unions
0	0	0	Rule would harm patients
1 No	0	1 No	First amendment right to support uni
1 No	0	1 No	Administratively burdensome if Rule
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1 No	0	1 No	Undermines unions
1 No	0	1 No	Administratively burdensome if Rule
1 No	1	0 No	Stop unauthorized automatic deducti
1 No	1	0 No	Providers should have choice of volur
1 No	1	0 No	Providers should have choice of volur
1 No	1	0 No	Anti-union
1 No	1	0 No	Anti-union
1 No	0	1 No	Does not violate Social Security Act
0	0	0	Rule would harm patients
0	0	0	Rule would harm workers
0	0	0	Afraid will lose insurance coverage
0	0	0	Administratively burdensome if Rule i
0	0	0	CMS failed to conduct an analysis of t
0	0	0	30 day comment period unfair
0	0	0	CMS claim in NPRM that rule is "desig
1 No	0	1 No	Government shouldn't tell us how to
0	0	0	Pro-union
0	0	0	Violates First Amendment
0	0	0	Administratively burdensome if Rule i
1 No	0	1 No	Government shouldn't tell us how to
0	0	0	Administratively burdensome if Rule i
0	0	0	Undermines unions
1 No	1	0 No	N/A
1 No	0	1 No	Pro-union
0	0	0	Afraid will lose insurance coverage
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0	0	0	Administratively burdensome if Rule i
1 No	0	1 No	Undermines unions
0	0	0	Administratively burdensome if Rule i
0	0	0	Government shouldn't tell us how to
1 No	1	0 No	Stop unauthorized automatic deducti
1 No	0	1 Yes	Does not violate Social Security Act
0	0	0	Rule would harm patients
0	0	0	Rule would harm workers
0	0	0	Undermines consumer directed care :
0	0	0	Section 1902(a)(32) was passed to pr
0	0	0	The regulation conflicts with the Nati

0	0	0	CMS failed to conduct an analysis of t
1 No	1	0 No	Governments should not be in the bu
1 No	1	0 No	Anti-union
1 No	1	0 No	Anti-union
1 No	1	0 No	Stop dues skimming
1 No	1	0	Governments should not be in the bu
0	0	0	Medicaid funds should not be diverte
0	0	0	Violates Section 32 of the SSA. In 201
0	0	0	Section 447.10(g)(4) facilitates impro
0	0	0	CMS should clarify or refute statemer
0	0	0	CMS should promulgate regulatory la
0	0	0	CMS should immediately take enforce
0	0	0	Payment can only be made to the pro
0	0	0	CMS has absolutely no statutory auth
1 No	1	0	Stop dues skimming
0	0	0	It is also important that states not co
1 No	1	0 No	Section 32 includes several specific a
0	0	0	Removing 42 C.F.R. § 447.10(g)(4) wil
1 No	1	0 No	N/A
1 No	0	1 Yes	Reduces state flexibility
0	0	0	Undermines consumer directed care :
0	0	0	May reduce qualified provider numbe
1 No	1	0 No	N/A
1 No	1	0 No	Eliminate public employee unions
1 No	0	1 Yes	The 2014 regulation established an o
0	0	0	Reduces state flexibility
0	0	0	May reduce qualified provider numbe
0	0	0	The regulation may inadvertently limi
0	0	0	Recommend including language that :
1 No	1	0 No	N/A
3 No	1	0 No	The current regulatory text is overbr
0	0	0	The diversion to SEIU of Medicaid fun
0	0	0	Diverts money from home care
1 No	1	0 No	N/A
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	N/A
1 No	0	1 No	Rule would harm patients
0	0	0	Rule would harm workers
1 No	1	0 No	N/A
1 No	0	1 Yes	Rule would harm patients
0	0	0	Rule would harm workers
0	0	0	Undermines unions
1 No	1	0 No	Diverts money from home care
1 No	1	0 No	N/A
1 No	0	1 No	Afraid will lose insurance coverage
0	0	0	The proposed rule threatens to disrupt
0	0	0	May reduce qualified provider numbe

1 No	1	0 No	Anti-union
1 No	1	0 No	Anti-union
1 No	0	0 No	N/A
1 No	1	0 No	Anti-union
1 No	1	0 No	Anti-union
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	Anti-union
1 No	1	0 No	Stop dues skimming
1 No	0	0 No	N/A
1 No	1	0 No	N/A
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	CMS has absolutely no statutory auth
0	0	0	Diverts money from home care
1 No	1	0 No	Stop dues skimming
1 No	0	1 Yes	Undermines unions
0	0	0	Undermines consumer directed care :
0	0	0	CMS failed to conduct an analysis of t
0	0	0	30 day comment period unfair
0	0	0	CMS provides no other explanation to
0	0	0	CMS is mischaracterizing or misunder
0	0	0	Courts have uniformly concluded that
0	0	0	Deductions made from a home care v
0	0	0	The NPRM singles out dues deduction
0	0	0	Disproportionately impacts women a
0	0	0	Rule would harm workers
0	0	0	Eliminating the ability of workers to p
0	0	0	Administratively burdensome if Rule i
0	0	0	The NPRM contradicts CMS's push for
0	0	0	Executive Orders 12866 and 13563 di
1 No	1	0	Section 32 includes several specific a
0	0	0	Providers should have choice of volur
1 No	1	0 No	Stop dues skimming
1 No	0	1 No	Undermines unions
0	0	0	First amendment right to support uni
0	0	0	Disproportionately impacts women a
0	0	0	May reduce qualified provider numbe
0	0	0	CMS failed to conduct an analysis of t
0	0	0	30 day comment period unfair
1 No	1	0 No	N/A
1 No	1	0 No	Stop dues skimming
1 No	0	0 No	N/A
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	Anti-union
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	Stop dues skimming
3 No	0	1 No	Section 1902(a)(32) was passed to pr

0	0	0	30 day comment period unfair
0	0	0	Executive Orders 12866 and 13563 di
0	0	0	May reduce qualified provider numbe
0	0	0	Eliminating the ability of workers to p
1 No	0	0 No	please stop the corruption and waste
1 No	1	0 No	Anti-union
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	Anti-union
1 No	0	0 No	We can not afford to hire union help.
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	CMS has absolutely no statutory auth
1 No	1	0 No	N/A
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	Anti-union
1 No	1	0 No	Anti-union
1 No	0	1 No	Afraid will lose insurance coverage
1 No	0	0 No	PLEASE legislate for the benefit of UR
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	Anti-union
1 No	1	0 No	Anti-union
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1 No	1	0 No	Anti-union
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1 No	1	0 No	Anti-union
1 No	1	0 No	Anti-union
1 No	1	0 No	Anti-union
1 No	0	0 No	We need to replace anti-american De
1 No	0	0 No	This corruption must cease and those
1 No	1	0 No	Anti-union
1 No	1	0 No	Anti-union
1 No	1	0 No	Stop dues skimming
1 No	0	0 No	Let's put Justice back in the American
1 No	1	0 No	Anti-union
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	Stop dues skimming
1 No	0	0 No	This is just another example of an out
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	Stop dues skimming

1 No	1	0 No	Stop dues skimming
1 No	1	0 No	Anti-union
1 No	0	0 No	Please help the Trump administrati
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	Stop dues skimming
1 No	0	0 No	STOP THE RAIDING AND THIEVING FR
1 No	0	0 No	Our business has lost employees whc
1 No	1	0 No	Anti-union
1 No	0	0 No	With all the things going on in the US
1 No	1	0 No	Anti-union
1 No	0	0 No	Every so called program that receives
1 No	1	0 No	Investigate unauthorized automatic c
1 No	1	0 No	Stop dues skimming
1 No	0	0 No	Corruption, no matter the source mu
1 No	1	0 No	Stop dues skimming
1 No	1	0 No	Stop dues skimming

Special Codes:
Outside
Organization/Individual - 1
Provider Advocacy Group 2
Political- 3
State - 4

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event providers from selling accounts receivables at a discount to private entities for the purpose of "factoring,"

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y direct payment provision was intended to address the issue of factoring." 77 Fed. Reg. 26362, 26392 (May 3, 2012).
d that the purpose of the statutory prohibition is to prevent factoring. The United States Court of Appeals for the

rg. ""Indeed, there may be cost savings resulting from the collective purchase of such benefits and greater workl
nt of the rule of providing state flexibility in payment: "CMS has long sought to ensure maximum state flexibility

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igned to ensure that taxpayer dollars dedicated to providing healthcare services for low-income vulnerable Ameri

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event providers from selling accounts receivables at a discount to private entities for the purpose of "factoring,"

onal Labor Relations Act which allows home care worker agencies to deduct union dues from paycheck

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d for unions

4, CMS conceded that Section 32 “does not expressly provide for additional exceptions to the direct payment pr
per uses of Medicaid funds

nt in Q&As that “[r]emoval of the regulatory text at 42 CFR 447.10(g)(4) will not apply to payment for services re
nguage or, at least make clear in the final rule, that Section 32 permits states to assign Medicaid monies owed to
ement actions against states that are violating Section 32 after CMS rescinds the Section 447.10(g)(4) regulatory
provider or beneficiary, even if they voluntarily agree to have a portion pay deducted for union dues. Section 32 pr
riority to add a completely new exemption to Section 32. Indeed, the previous administration admitted its violati

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nterdict federal law that makes it illegal to divert Medicaid funds to unions.

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l in no way prevent workers from voluntarily joining a union.

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it the ability of states to ensure that there are appropriate supports for individuals who self-direct their long-term
specifically allows for the option to deduct finance costs associated with self-directed care, including fiscal intern

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ids intended for homecare providers has allowed the union to spend millions of dollars on political activities.

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ot access to group health coverage for home health care workers and could result in an overall drop in health ou
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to back up the concern that the provision is “overbroad and insufficiently linked to the exceptions expressly permitted to stand the flow of payments to home care providers. The NPRM notes that the rule will end the ability of states to make similar arrangements, where funds are automatically transferred to a third party (such as so-called “double lock” arrangements) where a worker’s Medicaid payment do not confer any right to the entity to which the deduction is directed, whether for the benefit of unions as the sole example of a practice that will be implicated by the new rule, despite the fact that neither the rule nor the impact of the proposed action is directed at people of color.

participate in a health plan is likely to shift them to the state Medicaid program or other publicly subsidized coverage if the rule is changed

for state flexibility. 2014 rule does not require states to deduct payments on behalf of home care workers, but rather requires states to direct agencies to perform cost benefit analyses of proposed regulations and to select regulatory approaches that

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participate in a health plan is likely to shift them to the state Medicaid program or other publicly subsidized cover

[illegible]

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or submitting false or inflated claims to the federal government, not to prevent union dues and benefits from be

012) (emphasis added).

³ Fifth Circuit has found, “An examination of the legislative history of this provision reveals that its purpose was to

force stability.” 79 Fed. Reg. 2948, 3002 (Ja. 16, 2014). The Department stated further, “For the classes of practitioners to design state-specific payment methodologies that help ensure a strong, committed, and well-trained work force

cans are not siphoned away for other purposes" is false. The union dues are deducted from already earned income

or submitting false or inflated claims to the federal government, not to prevent union dues and benefits from be

inciple."

ndered under Sections 1915(c), 1915(i), 1915(j), and 1915(k) authorities, nor will it impact a state's ability to perform personal care providers only to government agencies or by court order—which will permit necessary tax deduction exemption.

provides that payments cannot be made to anyone other than a provider or beneficiary "under an assignment or portion of this principle in the comments quoted above, stating that Section 32 "does not expressly provide for additional

in services and supports (LTSS).
mediary services, payroll taxes, and other necessary expenses.

comes for populations other than home health care workers.

tted by the statute.” or any of the detail concerning its reasoning that one would normally expect in the preamble to “divert Medicaid payments away from providers” and claims that the rule is “designed to ensure that taxpayer “mailbox” arrangements used to convey Medicaid provider payments to a third party pursuant to the provider’s stand health insurance, union dues, or tax payments, to make a claim against the Medicaid program; they are merely a or the statute or previous regulation ever mention unions or deductions for union dues. This amounts to a substan

rage, likely leading to higher rather than lower costs for the state.

ner leaves it up to states choose to do so if they believe that electing such payment arrangements would benefit t maximize net benefits, “including potential economic, environmental, public health and safety, and other advant

maximize net benefits, “including potential economic, environmental, public health and safety, and other advantages, likely leading to higher rather than lower costs for the state.

ing taken out of individual providers' pay.

o prevent 'factoring' agencies from purchasing Medicare and Medicaid accounts receivable at a discount

providers for whom the state is the only or primary payer, these payment arrangements are an efficient arrangement. Currently, certain categories of Medicaid covered services, for which Medicaid is a primary payer, such

ne and diverted from Medicaid services. These services have already been provided and the dues are co

ing taken out of individual providers' pay.

form Financial Management Services (FMS) or secure FMS through a vendor arrangement.” Section 32 a
ctions—and not to private third parties, such as unions and their political action com- mittees, including

power of attorney or otherwise.” *Id.* (emphasis added). This means that providers and beneficiaries can
onal exceptions to the direct pay-ment principle,” and that the exemption was “not contemplated unde

[REDACTED]

to a rule, particularly one seeking to completely repeal current established policy that was last reviewed. Dollars dedicated to providing healthcare services for low income vulnerable Americans are not siphoned off through direct instructions, or payments directly to HMOs pursuant to contracts with their Medicaid-funded practices. This is an expression of the home care worker's ability to direct dollars that she owns as she chooses. See January 2014 rule change, a potential policy shift for which CMS provides no policy rationale. It will have a major impact on states, providers, and the Medicaid program.

In its discussion of the initial proposal of the 2014 rule change, CMS noted that (b) (5) DPP the criteria for determining whether a rule can be considered a "major" rule include: "the nature of the change; distributive impacts; and equity."³⁴ The criteria for determining whether a rule can be considered a "major" rule include: "the nature of the change; distributive impacts; and equity."³⁴

it and then serving as the collection agency for the accounts.” In *Re Missionary Baptist Foundation of Ar*

id effective method for ensuring that the workforce has health and welfare benefits and adequate train
uch as personal care services, suffer from especially high rates of turnover and low levels of participatio

coming out of the expenses already incurred, not from budgeted amounts for those services.

and 42 C.F.R. § 447.10 unquestionably apply to programs that operate under Sections 1915(c), 1915(i), 1915(w), and 1915(r); when payments are made through intermediaries. The Foundation recommends that the following language be added to the statute:

“(b) A provider of services under a capitated payment arrangement shall not agree, even voluntarily, to assign their payments to any other party, except as permitted in the statute, and is ‘an additional exception.’” Despite this admission, the previous administration cannot

d by the agency relatively recently. This description of the flow of dollars under current payment arrangements is “diverted away for other purposes.”⁵ These claims echo the contention of Senator Ron Johnson, in a letter he sent to the agency, as authorized by 42 CFR § 447.10(g)(3) despite the lack of any corresponding statutory authority. See *Centers for Medicare & Medicaid Services v. AFSCME Council 31, et al.*, 138 S.Ct. 2448, 2486 (2018).

Providers and consumers who have built consumer directed programs in reliance on CMS’s position that pay

CMS had “long sought to ensure maximum State flexibility to design State-specific payment methodologies and economically significant takes into account not only the impact of the regulation on the economy as r

merica, Inc., 796 F.2d 752, 757 n. 6 (5th Cir. 1986) (emphasis added).

ing for their functioning.”

n. We believe the proposed provider payment reassignment provision retained in the final rule will prov

tutory exceptions. Section 32 was enacted, in part, to prevent physicians and other providers from voluntarily accepting a new regulatory exemption into Section 32 for payments “made to a third party on behalf of the ir

ements is a gross mischaracterization that at best reflects a profound lack of understanding of IP home c
sent to CMS and in a follow-up staff report from the Committee on Homeland Security and Governmen
ity) are valid so long as they are consistent with the purposes of the statute.

ments like those described in 2014 regulation are allowable.

gies that help ensure a strong, committed, and well-trained workforce.”³² The proposed rule would tak
measured in dollar terms, but also broader effects.³⁵ Yet not only is CMS unable to provide an analysis

vide to states additional tools to help foster a stable and high performing workforce."

those authorities.

nents to individual practitioners who are employed, in whole or in part, by a beneficiary can be assigned

ntari-ly assigning their Medicaid payments to private third parties known as “factors.” See, e.g., 41 Fed.
individual practitioner for benefits such as health insurance, skills training and other benefits customary

are payment structures and at worst is deliberately misleading. Deductions made by states on behalf of
nt Affairs, that states are “skimming” dues from Medicaid payments that would otherwise go to provide

ce away this flexibility and subject states to a one-size-fits-all restriction that is completely at odds with
of the direct dollar impact of the regulation—acknowledging that it lacks sufficient data and relying on a

d only to a government agency or entity or by court order, including where such payments are made th

Reg. 36207 (Aug. 27, 1976); Prof'l Factoring Serv. Ass'n v. Mathews, 422 F. Supp. 250, 251-52 (S.D.N.Y. for em-ployees." 42 C.F.R. § 447.10(g)(4). The new exemption must be rescinded as inconsistent with th

home care workers for dues and other costs, such as health benefits, do not “divert” or “siphon” Medicaid care for Medicaid recipients. The NPRM’s regulatory impact analysis reflects a similar misunderstanding

Administrator Verma’s goal, expressed on numerous occasions, of increasing flexibility for states to make assertions from a single newspaper opinion piece to support a speculative and preliminary estimate, the

rough a fiscal agent, financial management service, or-ganized health care delivery system, or pass-thro

1976). Consequently, it is irrelevant under Section 32 whether a provider's assignment of Medicaid mo
ne statutory text.

paid dollars from any state Medicaid program. Rather, as described above, individual provider home care
ing, suggesting for instance that states may be increasing reimbursement levels in order to reassign porti

nage their Medicaid programs.

e NPRM also lacks any discussion of the broader impact of the rule. Furthermore, given that the rule con

ugh intermediary."

nies to another party is done voluntarily or involun-tarily.² Section 32 requires that payments must be

Workers receive payments from state Medicaid programs for services they provide to home care consumers. The rate of the provider payment to a third party and that they may lower those rates if providers are no longer

contemplates prohibiting deductions for costs such as health care, a full impact analysis should consider the

made directly to the provider or benefi-ci

umers. For these providers, these paymen
nger able to deduct payments for dues or other benefits

ne potential impact on state Medicaid prog

Final # of Posted Comment (Last 4 digits of the Document ID)	Attachment?	Author First Name	Author Last Name	Location (State/ Province)	Organization	Form Letter?
6985	Yes	Miriam	Laguras	CA	N/A	Yes
6986	Yes	Martha	M	CA	N/A	Yes
6987	Yes	Martha	Penteras	CA	N/A	Yes
6988	Yes	Martha	Alcocez	CA	N/A	Yes
6989	Yes	Marta	Jiminez	CA	N/A	Yes
6990	Yes	Michael	Ballard	CA	N/A	Yes
6991	Yes	Melissa	Hurtade	CA	N/A	Yes
6991						
6992	Yes	Melanie	Moua	CA	N/A	Yes
6993	Yes	Matilde	Chez	CA	N/A	Yes
6993						
6993						
6994	Yes	Martina	Ortege	CA	N/A	Yes
6995	Yes	Martha	Vega	CA	N/A	Yes
7000	Yes	Marlene	Danial	CA	N/A	Yes
7001	Yes	Maricruz	Mananarez	CA	N/A	Yes
7002	Yes	Marianne	Richelmann	CA	N/A	Yes
7003	Yes	N/A	N/A	CA	Palm Springs Teac	Yes
7003						
7004	Yes	Phu	Tran	CA	N/A	Yes
7005	Yes	Petronila	Duenas	CA	N/A	Yes
7006	Yes	Perry	Meudoza	CA	N/A	Yes
7007	Yes	Patricia	Brown	CA	N/A	Yes
7008	Yes	Pamela	Smith	CA	N/A	Yes
7009	Yes	Richardo	Peralta	CA	N/A	Yes
7010	Yes	Reyna	Chambers	CA	N/A	Yes
7011	Yes	Relfa	Gazely	CA	N/A	Yes
7012	Yes	Regina	Burton	CA	N/A	Yes
7013	Yes	Raul	Mendy	CA	N/A	Yes
7014	Yes	Rachel	Hardz	CA	N/A	Yes
7015	Yes	R	McDowell	CA	N/A	Yes
7016	Yes	Quelo	Gicer	CA	N/A	Yes
7017	Yes	Q M	Lier	CA	N/A	Yes
7018	Yes	Zubeda	Sial	CA	N/A	Yes
7019	Yes	Yvette	Flowers	CA	N/A	Yes
7020	Yes	Willie	Douglas	CA	N/A	Yes
7021	Yes	Wanda	Givens	CA	N/A	Yes
7022	Yes	N/A	N/A	WA	N/A	Yes
7023	Yes	Vincent	Haynie	CA	N/A	Yes

7024	Yes	Vicky	Arellanes	CA	N/A	Yes
7025	Yes	Veronica	Rios	CA	N/A	Yes
7026	Yes	Vanessa	Delgado	CA	N/A	Yes
7027	Yes	Toni	MacRae	CA	N/A	Yes
7028	Yes	Tayler	Casey	CA	N/A	Yes
7029	Yes	Susan	Rizo	CA	N/A	Yes
7030	Yes	Susan	Reed	CA	N/A	Yes
7031	Yes	Sunana	Suldana	CA	N/A	Yes
7032	Yes	Steve	Mathis	CA	N/A	Yes
7033	Yes	Socdrro	Larmonra	CA	N/A	Yes
7034	Yes	Sharron	Dangerfield	CA	N/A	Yes
7035	Yes	Shalle	Waldnu	CA	N/A	Yes
7035						
7036	Yes	Scott	Baker	CA	N/A	Yes
7037	Yes	Saul	Nido	CA	N/A	Yes
7038	Yes	Sara	Galids	CA	N/A	Yes
7038						
7039	Yes	Sandra	Hernandez	CA	N/A	Yes
7039						
7040	Yes	RoseMae	Cundare	CA	N/A	Yes
7041	Yes	Rosalva	Munoz	CA	N/A	Yes
7042	Yes	Rosalina	Pulido	CA	N/A	Yes
7043	Yes	Rosalicia	Herrera	CA	N/A	Yes
7043						
7044	Yes	Rosa	SaGastine	CA	N/A	Yes

Total Comments/ Signatures	Comment Matches Pivot Comment on Duplicates Tab? (include Pivot Comment Document ID)	In Support (1 = Yes) (0 =No)	In Opposition (1 = Yes) (0 =No)	Impact on Self-Direct Service Models	Special Considerations (if applicable)
1 N		0	1 No	N/A	
1 N		0	1 No	First amendment right to support uni	
				First amendment right to support	
1 N		0	1 No	unions	
1 N		0	1 No	Pro-union	
1 N		0	1 No	N/A	
1 N		0	1 No	Pro-union	
1 N		0	1 No	Rule would harm workers	
0		0	0	Rule would harm patients	
1 N		0	1 No	Administratively burdensome if Rule	
1 N		0	1 No	Rule would harm workers	
0		0	0	Rule would harm patients	
0		0	0	No evidence that consumers or provi	
1 N		0	1 No	N/A	
1 N		0	1 No	N/A	
1 N		0	1 No	Providers should have choice of volun	
1 N		0	1 No	Undermines unions	
1 N		0	1 No	Pro-union	
1 N		0	1 No	Rule would harm patients	
0		0	0	Rule would harm workers	
1 N		0	1 No	Don't change automatic deductions	
1 N		0	1 No	Don't change automatic deductions	
1 N		0	1 No	Undermines unions	
1 N		0	1 No	Pro-union	
1 N		0	1 No	Don't change automatic deductions	
1 N		0	1 No	Don't change automatic deductions	
1 N		0	1 No	First amendment right to support uni	
1 N		0	1 No	Don't change automatic deductions	
1 N		0	1 No	Don't change automatic deductions	
1 N		0	1 No	Undermines unions	
1 N		0	1 No	Government shouldn't tell us how to	
1 N		0	1 No	Afraid will lose insurance coverage	
1 N		0	1 No	Undermines unions	
1 N		0	1 No	N/A	
1 N		0	1 No	Undermines unions	
1 N		0	1 No	Afraid will lose insurance coverage	
1 N		0	1 No	Pro-union	
1 N		0	1 No	Don't change automatic deductions	
1 N		0	1 No	Undermines unions	
1 N		0	1 No	Don't change automatic deductions	

1 N	0	1 No	Pro-union
1 N	0	1 No	Pro-union
1 N	0	1 No	Afraid will lose insurance coverage
1 N	0	1 No	Rule would harm workers
1 N	0	1 No	Pro-union
1 N	0	1 No	Don't change automatic deductions
1 N	0	1 No	Don't change automatic deductions
1 N	0	1 No	Stop the attacks on home care worke
1 N	0	1 No	N/A
1 N	0	1 No	N/A
1 N	0	1 No	Government shouldn't tell us how to
1 N	0	1 No	Stop the attacks on home care worke
0	0	0	Rule would harm patients
0	0	0	Rule would harm workers
1 N	0	1 No	N/A
1 N	0	1 No	N/A
1 N	0	1 No	Rule would harm patients
0	0	0	Rule would harm workers
1 N	0	1 No	Rule would harm patients
0	0	0	Rule would harm workers
1 N	0	1 No	First amendment right to support uni
1 N	0	1 No	Government shouldn't tell us how to
1 N	0	1 No	Pro-union
1 N	0	1 No	Undermines unions
0	0	0	Government shouldn't tell us how to
1 N	0	1 No	N/A

Special Codes:
Outside
Organization/Individual - 1
Provider Advocacy Group 2
Political- 3

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spend our own money

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Final # of Posted Comment (Last 4 digits of the Document ID)	Attachment?	Author First Name	Author Last Name	Location (State/ Province)	Organization
6996	Yes	Martha	M	CA	N/A
6997	Yes	Martha	Penteras	CA	N/A
6998	Yes	Martha	Alcocez	CA	N/A
6999	Yes	Marta	Jiminez	CA	N/A

Form Letter?	Total Comments/ Signatures	Duplicate?	In Support (1 = Yes) (0 =No)	In Opposition (1 = Yes) (0 =No)	Impact on Self-Direct Service Models
Yes	1	N		0	1 No
Yes	1	N		0	1 No
Yes	1	N		0	1 No
Yes	1	N		0	1 No

Special Considerations (if applicable)	Special Codes: Outside Organization/Individual - 1 Provider Advocacy Group 2 Political- 3
N/A	1
First amendment right to support unions	1
Pro-union	1
N/A	1

Final # of Posted Comment (Last 4 digits of the Document ID)	Attachment?	Author First Name	Author Last Name	Location (State/ Province)	Organization
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Form Letter?	Total Comments/Si gnatures	Duplicate?	In Support (1 = Yes) (0 =No)	In Opposition (1 = Yes) (0 =No)	Summary of Comment (if applicable)

Justification of Comment Being Out of Scope	Special Considerations (if applicable)	Special Codes: Outside Organization/Individual - 1 Provider Advocacy Group 2 Political- 3

From: [Barco, Evell J. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Farrell, Caroline \(HHS/OGC\)](#); [Brewer, Annette M. \(CMS/OSORA\)](#); [Brooks, Gaysha M. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#); [Bryman, Mitch \(CMS/OSORA\)](#); [Laib, Eric C. \(CMS/OSORA\)](#)
Cc: [Clybourn, Olen D. \(CMS/OSORA\)](#); [Phan, Thomas M. \(CMS/OSORA\)](#); [Jones, Martique S. \(CMS/OSORA\)](#); [Harris, Sheli E. \(CMS/OSORA\)](#); [Lafferty, Tiffany R. \(CMS/OSORA\)](#); [Hubbard, Lisa A. \(CMS/OSORA\)](#); [Miller, Ruth A. \(CMS/OSORA\)](#); [Garcia, Vanessa \(CMS/OSORA\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Khan, Farooq A. \(CMS/OSORA\)](#)
Subject: ASL comments: Status of HHS cmmts: Reassignment of Medicaid Provider Claims (CMS-2413-P)
Date: Wednesday, April 18, 2018 11:17:07 AM
Attachments: [CMS-2413-P Master \(03-23-18\) ASL Comments \(002\).docx](#)

ASL cmmts-
HHS clearance is COMPLETE.
HHS comments were due Apr 13.

Comments: [REDACTED] (b)(5)

From: Barco, Evell J. (CMS/OSORA)
Sent: Wednesday, April 18, 2018 8:48 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>
Cc: Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Khan, Farooq A. (CMS/OSORA) <Farooq.Khan@cms.hhs.gov>
Subject: RE: Status of HHS cmmts: Reassignment of Medicaid Provider Claims (CMS-2413-P)

[REDACTED] (b)(5)

Thanks

From: Barco, Evell J. (CMS/OSORA)
Sent: Tuesday, April 17, 2018 4:19 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>
Cc: Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>;

Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: Status of HHS cmmts: OGC comments- Reassignment of Medicaid Provider Claims (CMS-2413-P)

(b)(5)

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From: Barco, Evell J. (CMS/OSORA)

Sent: Friday, April 13, 2018 11:22 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>

Cc: Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>

Subject: status of HHS cmmts: ACL non-concurrence, ASPE, ASFR- Reassignment of Medicaid Provider Claims (CMS-2413-P)

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Please note:

OGC is reviewing the 4/5 version(current draft) and is expected to comment today, 4/13. Inadvertently, the other reviewing offices received and reviewed an earlier version (dated 3-23). When comments come in please review for relevance to the newest draft, with deference to the OGC edits on the newer draft, as well. Contact me if you have questions or need clarification. Thanks.

From: Brewer, Annette M. (CMS/OSORA)
Sent: Thursday, April 5, 2018 10:44 AM
To: Shelton, Carrie A (HHS/IOS) <Carrie.Shelton@HHS.GOV>
Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Wilson, Lynette N. (CMS/OSORA) <Lynette.Wilson@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS 2413-P)—ADVANCE REGULATION
Importance: High

SUBJECT: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-P)—ADVANCE REGULATION

Action Requested: We are advancing the attached non-significant proposed rule for HHS review. **We wish to display this rule by June 22, 2018**, that removes the regulation text which allows a state to make payments to third parties on behalf of an individual provider for benefits. We are requesting HHS comments by Thursday, April 12th. **This is pre-decisional information and distribution should be limited to only those staff who must review and clear it.**

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Thank you for your help in expediting the publication of this proposed rule.

Attachments:

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From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher G. \(CMS/CMCS\)](#)
Cc: [Mikow, Asher S. \(CMS/CMCS\)](#)
Subject: CMS-2413-F (10-23-18) (CMSD OGC markup v2) AM 11-20-18.docx
Date: Tuesday, November 20, 2018 1:22:21 PM
Attachments: [CMS-2413-F \(10-23-18\) \(CMSD OGC markup v2\) AM 11-20-18.docx](#)

Hey Chris,

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Thanks,

Asher

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From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: CMS-2413-F (10-23-18) (CMSD OGC markup v2) AM 11-19-18.docx
Date: Monday, November 19, 2018 4:49:00 PM
Attachments: [CMS-2413-F \(10-23-18\) \(CMSD OGC markup v2\) AM 11-19-18.docx](#)

Hey Chris,

The team went through the rest of the comments. There are a number issues that still need to be worked on and some that need your review. I have highlighted these in **blue**. Please let me know if you have any questions and this version is up to date on SharePoint.

Thank you,

Asher

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From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: CMS-2413-Final Rule Shell(10-17-18).doc
Date: Wednesday, October 17, 2018 3:56:15 PM
Attachments: [CMS-2413-Final Rule Shell\(10-17-18\).doc](#)

Hey Chris,

Here is the draft with KF's revisions. Janet's are mostly grammatical and I will work on those in the morning before the picnic.

Thanks.

Asher

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From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher G. \(CMS/CMCS\)](#)
Subject: CMS-2413-Final Rule Shell(10-18-18).doc
Date: Friday, October 19, 2018 9:17:48 AM
Attachments: [CMS-2413-Final Rule Shell\(10-18-18\).doc](#)

Hey Chris,

(b)(5)

Thanks,
Asher

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From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher G. \(CMS/CMCS\)](#)
Subject: CMS-2413-Final Rule Shell(10-18-18).doc
Date: Thursday, October 18, 2018 9:22:56 AM
Attachments: [CMS-2413-Final Rule Shell\(10-18-18\).doc](#)

Hey Chris,

(b)(5)

Thanks and see you at the beach!

Asher

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Brooks, Gaysha M. \(CMS/OSORA\)](#); [Brewer, Annette M. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#)
Cc: [Boston, Beverly A. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#)
Subject: EOP Passback: Medicaid Provider Payment Reassignment NPRM
Date: Tuesday, June 19, 2018 12:14:00 PM
Attachments: [CMS-2413-P_Master \(06-14-19\)_06182018_passback.docx](#)
[CMS-2413-P_Master \(06-14-19\)_06182018_passback - Clean Copy.docx](#)

Hi Gaysha, Annette, and Cynthia,

FMG accepts DPC/NEC's edits with no comments. Attached is a "tracked changes" and a "clean" version of the pass back. I understand we are awaiting comments from HHS/OGC. Please forward this iteration to HHS/OGC (Kelly Cleary/Caroline Farrell).

Thank you,

Chris Thompson
Deputy Division Director
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7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Barco, Evell J. (CMS/OSORA)
Sent: Monday, June 18, 2018 5:51 PM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA)

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From: [Mack, Rosa \(CMS/CMCS\)](#)
To: [Fan, Kristin A. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#)
Cc: [Harshman, Sara \(CMS/OL\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#); [Teal, Lela \(CMS/CMCS\)](#)
Subject: FMG: OA edits to the CMCS Agenda
Date: Friday, September 7, 2018 7:04:17 AM
Attachments: [Proposed Agendas for Weeks 9-10-18 and 9-17-18 - CMCS.DOCX](#)
[PRR High level comments summary 8.30.18.docx](#)

GM. We received an ask to add "Provider Payment Reassignment" to the agenda for the September 18th meeting. I am checking with OSORA to see if we're just giving an update, or more. Have you all heard about this through some other sources?

Attached is the agenda with comment from Kathleen and the paper I have last time. Once I hear back from OSORA, I will circle back.

From: Khan, Farooq A. (CMS/OSORA)
Sent: Thursday, September 6, 2018 5:16 PM
To: Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>
Cc: Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>
Subject: OA edits to the CMCS Agenda

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Lyles, Tia \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#); [Ihrig, Jocelyn B. \(CMS/CMCS\)](#); [Brown, Sharon J. \(CMS/CMCS\)](#); [Johns, Hamilton J. \(CMS/CMCS\)](#); [Sabir, Jeremiah A. \(CMS/CMCS\)](#)
Subject: FW: Provider Reassignment (2413-P) Final Rule Template
Date: Monday, September 17, 2018 11:31:00 AM
Attachments: [CMS-2413-F Master Shell \(9-6-18\).doc](#)

FYI

Chris Thompson
Deputy Division Director
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From: Lambert-Lawson, Cynthia (CMS/OSORA)
Sent: Thursday, September 6, 2018 7:34 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template

Good Morning Chris,
Attached is the shell document for the Provider Reassignment final rule (CMS-2413-F).

From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Wednesday, September 5, 2018 3:58 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template

Hi Chris,

Cynthia Lambert-Lawson is the RDG Analyst for this rule. She will be sending you a shell document for the final rule.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, September 5, 2018 3:52 PM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: Provider Reassignment (2413-P) Final Rule Template

Hey Gaysha,

I hope this e-mail finds you in good spirits. Our analysis of the comments for 2413-P is more than halfway complete and we do not anticipate the aim of the rule changing much. I understand OSORA normally goes through the reg. text of the proposed rule and reformats the language for the final rule. We've been tasked by OCD with being ready to publish the final rule in a couple of weeks and I was wondering if the reformatting of the reg. text could be done in the next couple of days?

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410) 786-4044
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Fax: (410) 786-8533

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Johns, Hamilton J. \(CMS/CMCS\)](#); [Ihrig, Jocelyn B. \(CMS/CMCS\)](#); [Lyles, Tia \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#); [Brown, Sharon J. \(CMS/CMCS\)](#); [Sabir, Jeremiah A. \(CMS/CMCS\)](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: FW: Provider Reassignment (2413-P) Final Rule
Date: Monday, October 22, 2018 4:43:00 PM
Attachments: [CMS-2413-Final Rule.doc](#)

Job well done team!

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, October 22, 2018 4:42 PM
To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule

Good Afternoon Gaysha and Tiffany,

The attached draft final rule is being submitted for clearance.

Thank you,

Chris Thompson
Deputy Division Director

Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Friday, October 19, 2018 3:31 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Chris, Just checking in to see if we can still expect your draft today. Thanks!

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, October 16, 2018 12:26 PM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Tiffany,

We are still on track for the 10/19 date.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Boston, Beverly A. (CMS/CMCS)
Sent: Tuesday, October 16, 2018 12:22 PM
To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Thank you and Chris will let you know whether we're on track to meet the 10/19 date to OSORA.

Beverly

From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Tuesday, October 16, 2018 11:16 AM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Correct. OA understands that November will be a challenge, but they want to start there and see what HHS/OMB will agree to once we're ready to share with them for clearance.

From: Boston, Beverly A. (CMS/CMCS)
Sent: Tuesday, October 16, 2018 10:37 AM
To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Tiffany,

So the expedited schedule will be based on OA's November date correct? I know that depends on whether OMB will agree to a shorter review timeframe.

Beverly

From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Tuesday, October 16, 2018 9:28 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Good morning Chris, We don't have a firm schedule, but I do have some timeframes. The latest that I have heard is that the final rule will indicate a January publication target on the upcoming fall Unified Agenda, but OA has asked us to continue to target November TBD. We heard from Calder that we can expect your draft by 10/19. Please let us know if that changes.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, October 15, 2018 10:41 AM
To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Tiffany,

I wanted circle back to you to see if there has been any movement as far as the regulation schedule?

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410) 786-4044
Mobile: (b)(6)
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From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Tuesday, September 18, 2018 10:45 AM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Beverly, We're pending a response from Brady Brookes in OA on what the target date should be. OMB is pressing for a 90-days review; however, we understand that leadership would like it earlier. Once OA confirms direction for the target, we can develop the schedule.

Tiffany

From: Boston, Beverly A. (CMS/CMCS)

Sent: Tuesday, September 18, 2018 10:17 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Good morning,

Looping Tiffany, wanted to mention that the Administrator requested that we put this item back on this Thursday's Issues agenda although she was briefed on 9/5-- we believe she wants to know the timeframe to publish in final. We meet with our Center Directors tomorrow at 1pm and a new timeline reflecting a 10/31 (or late October) date to OSORA would be helpful.

Thanks

Beverly

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, September 17, 2018 5:11 PM

To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Gaysha,

We wanted to present a revised timeline to OCD this week. Can the timeline be revised to accommodate a 10/31/18 date to submit the rule to OSORA?

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410) 786-4044

Mobile: (b)(6)

Fax: (410) 786-8533

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Page 358 redacted for the following reason:

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From: [Mack, Rosa \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: FW: Provider Reassignment Next Steps
Date: Monday, July 9, 2018 9:40:14 AM
Attachments: [PaymentReassignment_ProposedRule-OA-CMCS-MRG-FINAL SV edits v2.docx](#)
[PBR 2413-P.OAs Formatted Final v2.docx](#)

Hi. See attached/below.

From: Lynch, Calder (CMS/OA)
Sent: Monday, July 9, 2018 9:38 AM
To: Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>
Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>
Subject: RE: Provider Reassignment Next Steps

(b)(5)

Calder

--

Calder Lynch

Senior Counselor
Office of the Administrator
Centers for Medicare & Medicaid Services (CMS)
Washington, DC 20201
Office: (202) 619-0630

From: Mack, Rosa (CMS/CMCS)
Sent: Tuesday, June 26, 2018 6:11 PM
To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>
Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>
Subject: Re: Provider Reassignment Next Steps

Thanks. Sent these to Jeremy and Chris for a quick look over.

On Jun 26, 2018, at 5:37 PM, Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov> wrote:

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Calder

--

Calder Lynch

Senior Counselor
Office of the Administrator
Centers for Medicare & Medicaid Services (CMS)
Washington, DC 20201
Office: (202) 619-0630

From: Mack, Rosa (CMS/CMCS)
Sent: Tuesday, June 26, 2018 11:46 AM
To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>
Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>
Subject: RE: Provider Reassignment Next Steps

Hi there. Any chance you were able to work on this?

From: Mack, Rosa (CMS/CMCS)
Sent: Friday, June 22, 2018 4:51 PM
To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>
Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>
Subject: Re: Provider Reassignment Next Steps

Ok. Thanks!

On Jun 22, 2018, at 4:49 PM, Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov> wrote:

(b)(5)

Calder

--

Calder Lynch

Senior Counselor
Office of the Administrator
Centers for Medicare & Medicaid Services (CMS)
Washington, DC 20201
Office: (202) 619-0630

From: Mack, Rosa (CMS/CMCS)

Sent: Friday, June 22, 2018 4:12 PM

To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>

Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>

Subject: RE: Provider Reassignment Next Steps

Calder: Let me know if you have any concerns/edits to the fact sheet and/or QAs.

From: Mack, Rosa (CMS/CMCS)

Sent: Friday, June 22, 2018 10:51 AM

To: Lynch, Calder (CMS/OA) <calder.lynnch@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>

Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>

Subject: RE: Provider Reassignment Next Steps

Attached are the QAs and the fact sheet. OC is working on drafting the press release.

(b)(5)

From: Lynch, Calder (CMS/OA)

Sent: Friday, June 22, 2018 10:08 AM

To: Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>

Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>

Subject: Re: Provider Reassignment Next Steps

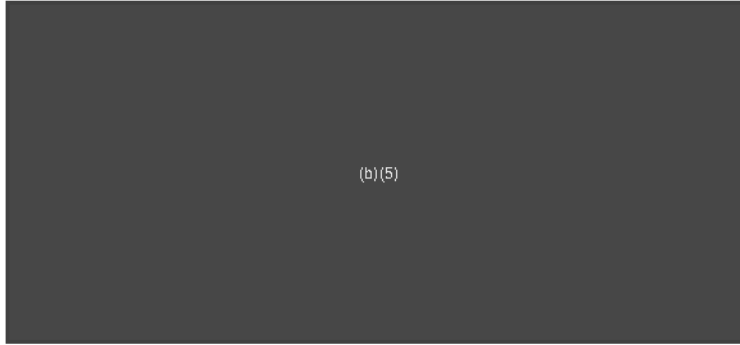
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Sent from my iPhone

On Jun 22, 2018, at 10:06 AM, Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov> wrote:

Here's what Calder was trying to say at the end of the

meeting:



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Sara Harshman
The Center for Medicaid and CHIP Services
Desk: (202) 205-8361
Cell: (b)(6)

<PRR Fact Sheet 6-21-18 RM (CL.docx>

<PRR 2413-P QAs CL.docx>

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From: [Harris, Melissa L. \(CMS/CMCS\)](#)
To: [Fan, Kristin A. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: FW: Provider Reassignment paper for OGD review
Date: Wednesday, October 10, 2018 9:51:06 AM
Attachments: [Provider Reassignment Rescission for OCD 10 10 2018.docx](#)

Hi FMG, DE is planning to elevate the attached paper to OCD today, as part of our Clearance discussion tomorrow. It's very high level, and you'll notice that the scale of the issue (of health insurance withholds) is much lower than we feared at our last meeting. This is based on some quick research. Happy to answer any questions. Do you need the appointment for Clearance tomorrow afternoon?

Melissa Harris

Senior Policy Advisor
Disabled and Elderly Health Programs Group
Center for Medicaid and CHIP Services
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Mail Stop S2-14-26
Baltimore, MD 21244
(p) 410-786-3397
melissa.harris@cms.hhs.gov



Please consider the environment before printing this e-mail.

From: Deboy, Alissa M. (CMS/CMCS)
Sent: Wednesday, October 10, 2018 8:11 AM
To: Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>
Cc: Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>
Subject: RE: Provider Reassignment paper for OGD review

One small change. I cleaned up the document. It is attached and ready to go to FMG.

Alissa Mooney DeBoy

Deputy Director

Disabled and Elderly Health Programs Group

Centers for Medicare and Medicaid Services

7500 Security Blvd

Mailstop S2-14-26

Baltimore, MD 21244

(410) 786-1699

Email: Alissa.deboy1@cms.hhs.gov

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From: Nardone, Michael P. (CMS/CMCS)
Sent: Wednesday, October 10, 2018 7:12 AM
To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>
Cc: Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>
Subject: RE: Provider Reassignment paper for OGD review

<< File: Provider Reassignment Rescission for OCD.docx >>

Couple of suggested edits. Otherwise I am OK if Alissa is. Mike

From: Harris, Melissa L. (CMS/CMCS)
Sent: Tuesday, October 9, 2018 5:43 PM
To: Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>
Cc: Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>
Subject: RE: Provider Reassignment paper for OGD review

I will send to FMG once you've blessed this. << File: Provider Reassignment Rescission for OCD.docx >>

Melissa Harris

Senior Policy Advisor
Disabled and Elderly Health Programs Group
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Baltimore, MD 21244
(p) 410-786-3397
melissa.harris@cms.hhs.gov



Please consider the environment before printing this e-mail.

From: Jensen, Kirsten (CMS/CMCS)
Sent: Friday, October 5, 2018 12:58 PM
To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>;

Sabir, Jeremiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under

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Yes, that was the intent.

From: Harris, Melissa L. (CMS/CMCS)

Sent: Friday, October 5, 2018 12:48 PM

To: Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under

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(b)(5)

Melissa Harris

Senior Policy Advisor
Disabled and Elderly Health Programs Group
Center for Medicaid and CHIP Services
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Mail Stop S2-14-26
Baltimore, MD 21244
(p) 410-786-3397
melissa.harris@cms.hhs.gov



Please consider the environment before printing this e-mail.

From: Cantwell, Kenya J. (CMS/CMCS)

Sent: Friday, October 5, 2018 12:18 PM

To: Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under

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<< File: Community First Choice - Service Delivery Models.docx >>

From: Jensen, Kirsten (CMS/CMCS)

Sent: Friday, October 5, 2018 11:28 AM

To: Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under

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Yes please.

From: Cantwell, Kenya J. (CMS/CMCS)

Sent: Friday, October 5, 2018 10:53 AM

To: Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown,

Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under

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From: Lollar, Ralph F. (CMS/CMCS)

Sent: Friday, October 5, 2018 10:10 AM

To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under

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Ralph

From: Harris, Melissa L. (CMS/CMCS)

Sent: Friday, October 5, 2018 10:08 AM

To: Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS)

<Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under

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Melissa Harris

Senior Policy Advisor
Disabled and Elderly Health Programs Group
Center for Medicaid and CHIP Services
Centers for Medicare and Medicaid Services
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Mail Stop S2-14-26
Baltimore, MD 21244
(p) 410-786-3397
melissa.harris@cms.hhs.gov



Please consider the environment before printing this e-mail.

From: Lollar, Ralph F. (CMS/CMCS)

Sent: Friday, October 5, 2018 10:07 AM

To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <jocelyn.ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under

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Melissa,

(b)(5)

Ralph

From: Harris, Melissa L. (CMS/CMCS)

Sent: Thursday, October 4, 2018 4:29 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>;

Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <locelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Lerimiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under

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Melissa Harris

Senior Policy Advisor
Disabled and Elderly Health Programs Group
Center for Medicaid and CHIP Services
Centers for Medicare and Medicaid Services
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Mail Stop S2-14-26
Baltimore, MD 21244
(p) 410-786-3397
melissa.harris@cms.hhs.gov



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From: Thompson, Christopher C. (CMS/CMCS)

Sent: Thursday, October 4, 2018 4:14 PM

To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <locelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Lerimiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Kayala, Dianne

E.(CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under

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Hey Melissa and Kenya,

(b)(5)

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

Mobile: (b)(6)

Fax: (410) 786-8533

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From: Harris, Melissa L. (CMS/CMCS)

Sent: Monday, October 1, 2018 5:03 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under

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Melissa Harris

Senior Policy Advisor

Disabled and Elderly Health Programs Group

Center for Medicaid and CHIP Services

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melissa.harris@cms.hhs.gov



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-----Original Appointment-----

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Thursday, September 27, 2018 2:12 PM

To: Thompson, Christopher C. (CMS/CMCS); Fan, Kristin A. (CMS/CMCS); Freeze, Janet G. (CMS/CMCS); Silanskis, Jeremy D. (CMS/CMCS); Ihrig, Jocelyn B. (CMS/CMCS); Mikow, Asher S. (CMS/CMCS); Lyles, Tia (CMS/CMCS); Brown, Sharon J. (CMS/CMCS); Sabir, Jeremiah A. (CMS/CMCS); Johns, Hamilton J. (CMS/CMCS); Popp, Dawn (HHS/OGC); Farrell, Caroline (HHS/OGC); Lollar, Ralph F. (CMS/CMCS); Kayala, Dianne E. (CMS/CMCS); Harris, Melissa L. (CMS/CMCS); Cantwell, Kenya J. (CMS/CMCS); Jensen, Kirsten (CMS/CMCS); Kirchner, Nancy (CMS/CMCS); Poisal, Kathryn J. (CMS/CMCS); Failla, George P. (CMS/CMCS)

Cc: Nardone, Michael P. (CMS/CMCS); Deboy, Alissa M. (CMS/CMCS); Delozier, Adrienne M. (CMS/CMCS)

Subject: Provider Reassignment and Self-Direction under (b)(5)

(b)(5)

When: Monday, October 1, 2018 2:30 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: CMS S3-20-01

The purpose of this meeting is to discuss that following question that was sent to OGC this past Monday:

DO NOT DELETE OR CHANGE ANY OF THE TEXT BELOW THIS LINE

CHRISTOPHER THOMPSON has scheduled this WebEx meeting.

Provider Reassignment and Self-Direction under (b)(5)
authorities

Host: CHRISTOPHER THOMPSON

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Hosts, need your host access code or key? Go to the meeting information page:

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Page 377 redacted for the following reason:

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From: [Fan, Kristin A. \(CMS/CMCS\)](#)
To: [Thompson, Christopher G. \(CMS/CMCS\)](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#)
Subject: FW: Provider Reassignment Regulation
Date: Monday, October 22, 2018 2:21:59 PM
Attachments: [CMS-2413-Final Rule \(10-19-18\) CL.doc](#)

Minimal comments from Calder (only 3). I think they all can be handled and then send to OSORA.

From: Teal, Lela (CMS/CMCS)
Sent: Monday, October 22, 2018 1:54 PM
To: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: FW: Provider Reassignment Regulation

Please see comment below

From: Lynch, Calder (CMS/OA)
Sent: Monday, October 22, 2018 1:53 PM
To: Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; Mayhew, Mary (CMS/OA) <Mary.Mayhew@cms.hhs.gov>
Cc: Harshman, Sara (CMS/CMCS) <Sara.Harshman@cms.hhs.gov>
Subject: RE: Provider Reassignment Regulation

(b)(5)

Calder

--

Calder Lynch

Senior Counselor
Office of the Administrator
Centers for Medicare & Medicaid Services (CMS)
Washington, DC 20201
Office: (202) 619-0630

From: Teal, Lela (CMS/CMCS)
Sent: Sunday, October 21, 2018 2:18 PM
To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; Mayhew, Mary (CMS/OA) <Mary.Mayhew@cms.hhs.gov>
Cc: Harshman, Sara (CMS/CMCS) <Sara.Harshman@cms.hhs.gov>
Subject: FW: Provider Reassignment Regulation

Following up on FMG's request to move this back to OSORA.

Thank you,

From: Boston, Beverly A. (CMS/CMCS)
Sent: Friday, October 19, 2018 4:55 PM
To: Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Harshman, Sara (CMS/CMCS) <Sara.Harshman@cms.hhs.gov>
Subject: FW: Provider Reassignment Regulation

Hello,

See below, OSORA is ping, but we won't move the reg until we hear back from the OCD.

Beverly

From: Fan, Kristin A. (CMS/CMCS)
Sent: Friday, October 19, 2018 2:15 PM
To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Mayhew, Mary (CMS/OA) <Mary.Mayhew@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>
Cc: Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: Provider Reassignment Regulation

Attached is a clean version of the final reg as well as an updated overview of comments received. Please let us know if there are any questions and if we can move it to OSORA early next week.

Page 380 redacted for the following reason:

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Page 407 redacted for the following reason:

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Farrell, Caroline \(HHS/OGC\)](#)
Subject: FW: Provider Reimbursement Reassignment NPRM
Date: Tuesday, June 5, 2018 12:47:00 PM
Attachments: [447.10 legislative history.docx](#)
[447.10 Feb 1978 43 FR 8801.pdf](#)

(b)(5)

FYI...For this afternoon's discussion!

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
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From: Blackfield, Anne (CMS/CMCS)
Sent: Tuesday, June 5, 2018 11:16 AM
To: Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Kayala, Dianne E.(CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: Provider Reimbursement Reassignment NPRM

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From: Lollar, Ralph F. (CMS/CMCS)

Sent: Monday, June 4, 2018 5:38 PM

To: Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Kayala, Dianne E.(CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Blackfield, Anne (CMS/CMCS) <Anne.Blackfield@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: RE: Provider Reimbursement Reassignment NPRM

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(b)(5)

Looping in Kirsten, Nancy and Kenya because Chris' question also has implications for the 1915(j).

Ralph

From: Failla, George P. (CMS/CMCS)

Sent: Monday, June 4, 2018 5:25 PM

To: Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Kayala, Dianne E.(CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Blackfield, Anne (CMS/CMCS) <Anne.Blackfield@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: FW: Provider Reimbursement Reassignment NPRM

(b)(5)

(b)(5)

Adding Marge, Dianne and Ralph

George

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, June 4, 2018 5:20 PM

To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>

Subject: Provider Reimbursement Reassignment NPRM

(b)(5)

Hello all,

(b)(5)

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410) 786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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search Triangle Park, N.C. 27711
telephone 919-541-5271.

SUPPLEMENTARY INFORMATION: This action is being taken in accordance with the requirements of 1 CFR 21.43 and is authorized under section 301(a) of the Clean Air Act, as amended, 42 U.S.C. 7601(a). Because the amendments are clerical in nature and affect no substantive rights or requirements, the Administrator finds it unnecessary to propose and invite public comment.

Dated: February 24, 1978.

DOUGLAS M. COSTLE,
Administrator.

Parts 60 and 61 of Chapter I, Title 40 of the Code of Federal Regulations are revised as follows:

1. The authority citation following the table of sections in Part 60 is revised to read as follows:

AUTHORITY: Sec. 111, 301(a) of the Clean Air Act as amended (42 U.S.C. 7411, 7601(a)), unless otherwise noted.

§§ 60.10 and 60.24 [Amended]

2. Following §§ 60.10 and 60.24(g) the following authority citation is added:

(Sec. 116 of the Clean Air Act as amended (42 U.S.C. 7416)).

§§ 60.7, 60.8, 60.9, 60.11, 60.13, 60.45, 60.46, 60.53, 60.54, 60.63, 60.64, 60.73, 60.74, 60.84, 60.85, 60.93, 60.105, 60.106, 60.113, 60.123, 60.133, 60.144, 60.153, 60.154, 60.165, 60.166, 60.175, 60.176, 60.185, 60.186, 60.194, 60.195, 60.203, 60.204, 60.213, 60.214, 60.223, 60.224, 60.233, 60.234, 60.243, 60.244, 60.253, 60.254, 60.264, 60.265, 60.266, 60.273, 60.274, 60.275, and Appendices A, B, C, and D [Amended]

3. The following authority citation is added to the above sections and appendices:

(Sec. 114, Clean Air Act as amended (42 U.S.C. 7414)).

4. The authority citation following the table of sections in part 61 is revised to read as follows:

AUTHORITY: Sec. 112, 301(a) of the Clean Air Act as amended (42 U.S.C. 7412, 7601(a)), unless otherwise noted.

§ 61.16 [Amended]

5. Following § 61.16, the following authority citation is added:

(Sec. 116, Clean Air Act as amended (42 U.S.C. 7416)).

§§ 61.09, 61.10, 61.12, 61.13, 61.14, 61.15, 61.24, 61.33, 61.34, 61.43, 61.44, 61.53, 61.54, 61.55, 61.67, 61.68, 61.69, 61.70, 61.71, and Appendices A and B [Amended]

5. The following authority citation is added to the above sections and appendices:

(Sec. 114 of the Clean Air Act as amended (42 U.S.C. 7414)).

[FR Doc. 78-5347 Filed 3-2-78; 8:45 am]

[6820-24]

Title 41—Public Contracts and Property Management

CHAPTER 101—FEDERAL PROPERTY MANAGEMENT REGULATIONS

SUBCHAPTER E—SUPPLY AND PROCUREMENT

[FPMR Amendment E-216]

PART 101-25—GENERAL

Energy Conservation Policy

AGENCY: General Services Administration.

ACTION: Final rule.

SUMMARY: Pursuant to the provisions of section 381(a)(1) of Pub. L. 94-163, Energy Policy and Conservation Act, this directive amends GSA regulations to include an energy policy statement. This directive takes the necessary action to comply with the public law by providing a basis for the promulgation of future directives with respect to energy conservation in supply management.

EFFECTIVE DATE: March 3, 1978.

FOR FURTHER INFORMATION CONTACT:

Mr. John I. Tait, Director, Regulations and Management Control Division, Office of the Executive Director, Federal Supply Service, General Services Administration, Washington, D.C. 20406, 703-557-1914.

The table of contents for Part 101-25 is amended by revising the following entry:

Sec.
101-25.112 Energy conservation policy.

Subpart 101-25.1—General Policies

Section 101-25.112 is revised as follows:

§ 101-25.112 Energy conservation policy.

(a) Agency officials responsible for procurement, management, and disposal of personal property and non-personal services shall ensure that pertinent procurement and property management documents reflect the policy set forth in (b), below, which has been established pursuant to Pub. L. 94-163, Energy Policy and Conservation Act.

(b) With respect to the procurement or lease of personal property or non-personal services, which in operation consume energy or contribute to the conservation of energy, executive agencies shall promote energy conservation and energy efficiency by being responsive to the energy efficiency and/or conservation standards or goals prescribed by the U.S. Government.

(Sec. 205(c), 63 Stat. 390; 40 U.S.C. 486(c)).

NOTE:—The General Services Administration has determined that this document does not contain a major proposal requiring preparation of an Inflation Impact State-

ment under Executive Order 11821 and OMB Circular A-107.

Dated: February 16, 1978.

JAY SOLOMON,
Administrator of
General Services.

[FR Doc. 78-5579 Filed 3-2-78; 8:45 am]

[4110-35]

Title 42—Public Health

CHAPTER IV—HEALTH CARE FI- NANCING ADMINISTRATION, DE- PARTMENT OF HEALTH, EDUCA- TION, AND WELFARE

PART 449—SERVICES AND PAYMENT IN MEDICAL ASSISTANCE PRO- GRAMS

Prohibition Against Reassignment of Provider Claims

AGENCY: Health Care Financing Administration (HCFA), HEW.

ACTION: Final rule.

SUMMARY: This is a technical change in existing Medicaid regulations which prohibit reassignment of claims for payment by Medicaid providers. It: (1) Expands the prohibition to cover all providers, (2) allows reassignments to government agencies and reassignments under court orders, and (3) adds a restriction on payment to billing services. These changes are required by Pub. L. 95-142, enacted October 25, 1977, and are intended to prevent fraudulent claims.

DATE: Effective October 25, 1977.

FOR FURTHER INFORMATION CONTACT:

Estelle Seldowitz, 202-245-0233.

SUPPLEMENTARY INFORMATION: Current regulations for the Medicaid program (Title XIX, Social Security Act) prohibit reassignments and use of factors by health care providers other than those reimbursed on a reasonable cost basis (42 CFR 449.31). Section 2(a)(3) of Pub. L. 95-142, the Medicare-Medicaid Anti-Fraud and Abuse Amendments, amended section 1902(a)(32) of the Act to expand this prohibition to all providers.

The current requirements also prohibit a power of attorney arrangement under which the check is payable to the provider, but cashed by a factor. Pub. L. 95-142 now incorporates a power of attorney prohibition. However, the statute allows reassignments to government agencies and reassignments resulting from court orders as an exception to this requirement.

The existing regulation also specifies that provider payments for billing services must be reasonably related to the

cost of processing the billings, and not related on a percentage basis to the dollar amounts to be billed or collected. The statute broadens this rule by adding that "compensation . . . is not dependent upon the actual collection of any such payment."

Accordingly, the regulation is revised to: (1) Expand the prohibition against reassignment to all providers, (2) allow power of attorney arrangements with respect to government agencies and court orders, and (3) incorporate the new restriction on payments for billing services.

States are expected to enforce this regulation by taking appropriate administrative action against those providers who continue to use factors.

The Department has found that good cause exists for dispensing with notice and opportunity for public comment, since this regulation only makes technical changes, required by the statute, to existing regulations.

These provisions are effective by law on the date of enactment, October 25, 1977. However, the Department recognizes the need to allow States lead time to amend their State plans and revise administrative procedures, and has had a long-standing policy of setting effective dates with this need in mind. Therefore, States will have until 90 days after publication of these regulations to submit plan amendments. During that period the State Medicaid agencies are expected to comply with these statutory amendments, but the Department will not take any compliance actions under section 1904 of the Act which would otherwise apply.

These prohibitions against factoring are already in effect under the Medicare program as well, by virtue of the amendments to Title XVIII made by sections 2(a) (1) and (2) of Pub. L. 95-142. The Medicare amendments also became effective on the date of enactment, October 25, 1977. Although the statute is in effect, the Department plans to issue a Notice of Proposed Rulemaking that will propose additional administrative enforcement procedures for public comment.

42 CFR 449.31 is revised to read as follows:

§ 449.31 Prohibition against reassignment of claims to benefits.

(a) *Meaning of terms.* For purposes of this section:

(1) "Facility" is a hospital or other institution which furnishes health care services to inpatients.

(2) "Organized health care delivery system" is a public or private organization for delivering health services. The system may include, but is not limited to, a clinic or a group practice prepaid capitation plan.

(3) "Factor" is an organization, i.e., collection agency or service bureau, which, or an individual who, advances

money to a provider for his accounts receivable which the provider has assigned or sold, or otherwise transferred, including transfer through the use of power of attorney, to this organization or individual. The organization or individual receives an added fee or a deduction of a portion of the face value of the accounts receivable in return for the advanced money. For purposes of this regulation, the term "factor" does not include business representatives, such as billing agents or accounting firms as described in paragraph (e) of this section.

(b) *State plan requirements.* A State plan for medical assistance under title XIX of the Social Security Act must provide that the requirements of paragraph (c) through (g) of this section are met.

(c) *To whom payment is made.* Except as specified in paragraphs (d), (e), and (f), no payment under the State plan for any care or service furnished to an individual by a health care provider shall be made to anyone other than that individual (if he is eligible to receive this payment under § 449.32 of this chapter) or the provider.

(d) *Assignments.* Payment may be made in accordance with an assignment from the provider to a government agency or an assignment made pursuant to a court order.

(e) *Business agents.* Payment may be made to a business agent (such as a billing service or accounting firm) who renders statements and receives payments in the name of the provider, if the agent's compensation for this service is:

(1) Reasonably related to the cost of processing the billings,

(2) Not related on a percentage or other basis to the dollar amounts to be billed or collected, and

(3) Not dependent upon the actual collection of payment.

(f) *Individual practitioners.* With respect to physicians, dentists, or other individual practitioners, payment may be made:

(1) To the employer of the physician, dentist, or other practitioner if the practitioner is required as a condition of his employment to turn over his fees to his employer; or

(2) To the facility in which the care or service was provided, if there is a contractual arrangement between the practitioner and that facility whereby the facility submits the claim for reimbursement; or

(3) To a foundation, plan, or similar organization, including a health maintenance organization, which furnishes health care through an organized health care delivery system if there is a contractual arrangement between the organization and the person furnishing the service under which the organization bills or receives payments for such person's services.

(g) *Payment to factors specifically prohibited.* Payment under the plan for any care or service furnished to an individual by a provider shall not be made to or through a factor, either directly, or by virtue of a power of attorney given by the provider to the factor.

(Sec. 1102, 49 Stat. 647 (42 U.S.C. 1302).)

(Catalog of Federal Domestic Assistance Program No. 13.714, Medical Assistance Program.)

NOTE.—The Health Care Financing Administration has determined that this document does not require preparation of an economic impact statement under Executive Order 11821, as amended by Executive Order 11949, and OMB Circular A-107.

Dated: January 26, 1978.

ROBERT A. DERZON,
Administrator, Health Care
Financing Administration.

Approved: February 25, 1978.

JOSEPH A. CALIFANO, Jr.,
Secretary.

[FR Doc. 78-5680 Filed 3-2-78; 8:45 am]

[4110-35]

PART 450—ADMINISTRATION OF MEDICAL ASSISTANCE PROGRAMS

Reasonable Cost Reimbursement of Inpatient Hospital Services

AGENCY: Health Care Financing Administration (HCFA), HEW.

ACTION: Final rule.

SUMMARY: This rule revises and clarifies current rules and adds new requirements for State payment methods for inpatient hospital services under State Medicaid programs (medical assistance, title XIX of the Social Security Act). State agencies, hospitals, and other interested parties have raised questions about use of Medicare and other methods, and about public review of proposed changes in State payments. The rule clarifies Federal criteria requiring States to provide for public and provider involvement.

EFFECTIVE DATE: June 1, 1978.

FOR FURTHER INFORMATION CONTACT:

Joseph E. Dougherty, 202-245-0048.

SUPPLEMENTARY INFORMATION: Notice of proposed rule making (NPRM) was published on September 3, 1976 (41 FR 37341). The purposes of the proposed rule were to clarify the current regulation on reasonable cost reimbursement of inpatient hospital services under Medicaid, and, where State payment methods differ from those used under Medicare, to add new conditions of approval.

The purpose and effect of the current Medicaid regulations (42 CFR

Page 413 redacted for the following reason:

(b)(5)

Page 414 redacted for the following reason:

(b)(5)

Page 415 redacted for the following reason:

(b)(5)

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Jensen, Kirsten \(CMS/CMCS\)](#); [Kirchner, Nancy \(CMS/CMCS\)](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: FW: PRR Comments - NASUAD Letter
Date: Wednesday, September 5, 2018 5:01:00 PM
Attachments: [NASUAD Letter - CMS 2413-P - Provider Reimbursement Reassignment.pdf](#)

FYI

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, September 5, 2018 4:09 PM
To: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: PRR Comments - NASUAD Letter

Hi Mike, Alissa and Kristin,

Attached is the letter we received from NASUAD.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044

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From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, September 5, 2018 10:14 AM
To: Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: PRR Comments - NASUAD Letter ***Draft Preamble Language ***

Hey Kenya,

We don't need a quick turnaround on the response. A response by COB 9/14/18 would be perfect!

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: Cantwell, Kenya J. (CMS/CMCS)
Sent: Wednesday, September 5, 2018 9:41 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: RE: PRR Comments - NASUAD Letter ***Draft Preamble Language ***

How quickly do you need a response from us? I would like to discuss this at our DBC/DLTSS meeting, but we do not meet again until next Wed.

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Tuesday, September 4, 2018 5:12 PM

To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>

Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: RE: PRR Comments - NASUAD Letter ***Draft Preamble Language ***

Thank you all for responding. In thinking about the language that will go into the preamble of the final rule. I am thinking it should read similar to the following:

(b)(5)

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

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Fax: (410) 786-8533

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From: Harris, Melissa L. (CMS/CMCS)

Sent: Thursday, August 30, 2018 2:20 PM

To: Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <jocelyn.ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: PRR Comments - NASUAD Letter

(b)(5)

Melissa Harris
Senior Policy Advisor
Disabled and Elderly Health Programs Group
Center for Medicaid and CHIP Services
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Mail Stop S-14-26
Baltimore, MD 21244
(p) 410-786-3397
melissa.harris@cms.hhs.gov



Please consider the environment before printing this e-mail.

From: Cantwell, Kenya J. (CMS/CMCS)
Sent: Thursday, August 30, 2018 8:48 AM
To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <jocelyn.ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: PRR Comments - NASUAD Letter

(b)(5)

(b)(5)

I am also interested in Kathy's thoughts on this.

From: Harris, Melissa L. (CMS/CMCS)
Sent: Wednesday, August 29, 2018 3:20 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <jocelyn.ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: Re: PRR Comments - NASUAD Letter

(b)(5)

Sent from my iPhone

On Aug 29, 2018, at 1:35 PM, Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov> wrote:

Hi Melissa, Kathy and Kenya,

(b)(5)

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Ihrig, Jocelyn B. (CMS/CMCS)

Sent: Wednesday, August 29, 2018 11:07 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: PRR Comments - NASUAD Letter

Hey Chris,

I found one letter so far from [NASUAD](#). I think that's the entity that was mentioned during clearance.

Thanks,
Jocelyn

<NASUAD Letter - CMS 2413-P - Provider Reimbursement Reassignment.pdf>



1201 15th Street NW
Suite 350
Washington, DC 20005
Phone 202-898-2578
Fax 202-898-2583
www.nasuad.org

August 13, 2018

Seema Verma, Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-2413-P
P.O. Box 8016
Baltimore, MD 21244-8016

Re: CMS-2413-P

Dear Administrator Verma:

On behalf of the National Association of States United for Aging and Disabilities (NASUAD), I am submitting comments on the recently proposed regulation entitled Reassignment of Medicaid Provider Claims (CMS-2413-P). NASUAD represents the 56 officially designated state and territorial agencies on aging and disabilities. Each of our members oversees the implementation of the Older Americans Act (OAA), and many also serve as the operating agency in their state for Medicaid waivers and managed long-term services and supports programs that serve older adults and individuals with disabilities. Together with our members, we work to design, improve, and sustain state systems delivering home and community-based services (HCBS) and supports for people who are older or have a disability and for their caregivers.

As you know, the proposed rule would remove regulatory language promulgated in 2014 that added exceptions to the prohibition on reassignment of provider claims. Specifically, the 2014 regulation allowed for payment to a third party, “for benefits such as health insurance, skills training and other benefits customary for employees.”¹ Based on this provision, states have the option to establish payment arrangements with third party entities to assist with group purchasing of insurance, to help with skills training and other professional tasks.

We are concerned that removal of this provision may limit the ability of states to assist with ensuring cost-effective health insurance coverage for service providers or to establish training protocols that improve the quality of HCBS. This would be disruptive to a number of states who have leveraged this provision in efforts to address worker shortages by expanding benefits that can help recruit and retain providers in their HCBS systems. We specifically note that the 2014 regulation established an option that states can elect to implement and is not a requirement. Therefore, we recommend that this provision be retained as a state option and not as a mandate.

¹ 42 CFR §447.10(g)(4)

We also are concerned that the regulation may inadvertently limit the ability of states to ensure that there are appropriate supports for individuals who self-direct their long-term services and supports (LTSS). In many LTSS programs, participants have employer authority, which provides the right to hire and fire staff, set hours, and train the individuals providing care. In a number of cases, individuals can also direct how the money in their LTSS budget is spent through a process known as budget authority. In order to support individuals perform the tasks associated with self-direction, states routinely establish fiscal intermediary services, which can be financed in a number of different ways including through deductions from the participant budgets and provider payments. We recognize that the preamble of the regulation specifically addresses issues of self-direction and that CMS does not intend to limit the ability of participants to exercise employer and budget authority. If CMS does finalize this change, we recommend including language that specifically allows for the option to deduct finance costs associated with self-directed care, including fiscal intermediary services, payroll taxes, and other necessary expenses.

We appreciate the opportunity to comment on this regulation and would be happy to discuss our concerns in more detail. Please feel free to contact Damon Terzaghi of my staff at dterzaghi@nasuad.org with any questions about these comments.

Sincerely,



Martha A. Roherty
Executive Director
NASUAD

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Harris, Melissa L. \(CMS/CMCS\)](#); [Poisal, Kathryn J. \(CMS/CMCS\)](#); [Cantwell, Kenya J. \(CMS/CMCS\)](#)
Cc: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: FW: PRR Comments - NASUAD Letter
Date: Wednesday, August 29, 2018 1:35:00 PM
Attachments: [NASUAD Letter - CMS 2413-P - Provider Reimbursement Reassignment.pdf](#)

Hi Melissa, Kathy and Kenya,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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may result in prosecution to the full extent of the law.

From: Ihrig, Jocelyn B. (CMS/CMCS)
Sent: Wednesday, August 29, 2018 11:07 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: PRR Comments - NASUAD Letter

Hey Chris,

I found one letter so far from [NASUAD](#). I think that's the entity that was mentioned during clearance.

Thanks,
Jocelyn



1201 15th Street NW
Suite 350
Washington, DC 20005
Phone 202-898-2578
Fax 202-898-2583
www.nasuad.org

August 13, 2018

Seema Verma, Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-2413-P
P.O. Box 8016
Baltimore, MD 21244-8016

Re: CMS-2413-P

Dear Administrator Verma:

On behalf of the National Association of States United for Aging and Disabilities (NASUAD), I am submitting comments on the recently proposed regulation entitled Reassignment of Medicaid Provider Claims (CMS-2413-P). NASUAD represents the 56 officially designated state and territorial agencies on aging and disabilities. Each of our members oversees the implementation of the Older Americans Act (OAA), and many also serve as the operating agency in their state for Medicaid waivers and managed long-term services and supports programs that serve older adults and individuals with disabilities. Together with our members, we work to design, improve, and sustain state systems delivering home and community-based services (HCBS) and supports for people who are older or have a disability and for their caregivers.

As you know, the proposed rule would remove regulatory language promulgated in 2014 that added exceptions to the prohibition on reassignment of provider claims. Specifically, the 2014 regulation allowed for payment to a third party, “for benefits such as health insurance, skills training and other benefits customary for employees.”¹ Based on this provision, states have the option to establish payment arrangements with third party entities to assist with group purchasing of insurance, to help with skills training and other professional tasks.

We are concerned that removal of this provision may limit the ability of states to assist with ensuring cost-effective health insurance coverage for service providers or to establish training protocols that improve the quality of HCBS. This would be disruptive to a number of states who have leveraged this provision in efforts to address worker shortages by expanding benefits that can help recruit and retain providers in their HCBS systems. We specifically note that the 2014 regulation established an option that states can elect to implement and is not a requirement. Therefore, we recommend that this provision be retained as a state option and not as a mandate.

¹ 42 CFR §447.10(g)(4)

We also are concerned that the regulation may inadvertently limit the ability of states to ensure that there are appropriate supports for individuals who self-direct their long-term services and supports (LTSS). In many LTSS programs, participants have employer authority, which provides the right to hire and fire staff, set hours, and train the individuals providing care. In a number of cases, individuals can also direct how the money in their LTSS budget is spent through a process known as budget authority. In order to support individuals perform the tasks associated with self-direction, states routinely establish fiscal intermediary services, which can be financed in a number of different ways including through deductions from the participant budgets and provider payments. We recognize that the preamble of the regulation specifically addresses issues of self-direction and that CMS does not intend to limit the ability of participants to exercise employer and budget authority. If CMS does finalize this change, we recommend including language that specifically allows for the option to deduct finance costs associated with self-directed care, including fiscal intermediary services, payroll taxes, and other necessary expenses.

We appreciate the opportunity to comment on this regulation and would be happy to discuss our concerns in more detail. Please feel free to contact Damon Terzaghi of my staff at dterzaghi@nasuad.org with any questions about these comments.

Sincerely,



Martha A. Roherty
Executive Director
NASUAD

From: [Boston, Beverly A. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#)
Subject: FW: REQUEST FOR CLEARANCE: CMS-2413-F Due COB 10/29
Date: Wednesday, October 31, 2018 10:39:12 AM
Attachments: [image001.png](#)
[CMS-2413-F - 10.25.18 - DEHPG.DOCX](#)

Hello,

Did you get these comments from DEHPG?

Beverly

From: Teal, Lela (CMS/CMCS)
Sent: Wednesday, October 31, 2018 8:04 AM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: FW: REQUEST FOR CLEARANCE: CMS-2413-F Due COB 10/29

Please note DE comments

From: CMS CMSO_REGS
Sent: Tuesday, October 30, 2018 6:01 PM
To: Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>
Cc: CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; Taylor, Kenneth L. (CMS/CMCS) <Kenneth.Taylor@cms.hhs.gov>; Mannix, Norma J. (CMS/CMCS) <norma.mannix@cms.hhs.gov>; Kassel, Adeena (CMS/CMCS) <Adeena.Kassel@CMS.hhs.gov>
Subject: FW: REQUEST FOR CLEARANCE: CMS-2413-F Due COB 10/29

Good Evening OCD

Attached are DEHPG comments.

Comments are on Pages – 2, 7, 8, 9, 11, 12, 13, 17, 19, 20,

Comments are due to OSORA today.

Anna Meyers
Division of Operations and Executive Support
Center For Medicaid CHIP Services
410-786-5364

From: CMS CMSO_REGS

Sent: Wednesday, October 24, 2018 9:18 AM

To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Conover, Lillian A. (CMS/CMCS) <Lillian.Conover@cms.hhs.gov>; DeCaro, Teresa (CMS/CMCS) <teresa.decaro@cms.hhs.gov>; Delozier, Adrienne M. (CMS/CMCS) <Adrienne.Delozier@cms.hhs.gov>; Fuller, Barbara A. (CMS/CMCS) <Barbara.Fuller@cms.hhs.gov>; Guarisco, Victoria M. (CMS/CMCS) <Victoria.Guarisco@cms.hhs.gov>; Hill, Elizabeth H. (CMS/CMCS) <Elizabeth.Hill@cms.hhs.gov>; Llanos, Karen E. (CMS/CMCS) <Karen.Llanos@cms.hhs.gov>; Lofton, Beverly A. (CMS/CMCS) <Beverly.Lofton@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Marx, Kitty (CMS/CMCS) <kitty.marx@cms.hhs.gov>; Moore, Tonya A. (CMS/CMCS) <Tonya.Moore@cms.hhs.gov>; Setala, Ashley (CMS/CMCS) <Ashley.Setala@cms.hhs.gov>; Sheppard, Brenda D. (CMS/CMCS) <Brenda.Sheppard@cms.hhs.gov>; Ghafari, Pascale (CMS/CMCS) <Pascale.Ghafari@cms.hhs.gov>; Erwin, Tanesha (CMS/CMCS) <tanisha.erwin@cms.hhs.gov>; Bianco-Ringley, Lindsay (CMS/CMCS) <Lindsay.Bianco-Ringley@cms.hhs.gov>

Cc: Corbin, Angela T. (CMS/CMCS) <Angela.Corbin@cms.hhs.gov>; Costello, Anne Marie (CMS/CMCS) <AnneMarie.Costello@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>; Delone, Sarah (CMS/CMCS) <Sarah.Delone2@CMS.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Kassel, Adeena (CMS/CMCS) <Adeena.Kassel@CMS.hhs.gov>; Mannix, Norma J. (CMS/CMCS) <norma.mannix@cms.hhs.gov>; McGuigan, Gregory M. (CMS/CMCS) <Gregory.McGuigan@cms.hhs.gov>; Meyers, Anna C. (CMS/CMCS) <Anna.Meyers@cms.hhs.gov>; Reed, Maria R. (CMS/CMCS) <Maria.Reed@cms.hhs.gov>; Taylor, Kenneth L. (CMS/CMCS) <Kenneth.Taylor@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Whelan, Ellen Marie (CMS/CMCS) <EllenMarie.Whelan@cms.hhs.gov>; Harshman, Sara (CMS/CMCS) <Sara.Harshman@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>

Subject: REQUEST FOR CLEARANCE: CMS-2413-F Due COB 10/29

DUE DATE: **COB 10/29**

TITLE: CMS-2413-F: Medicaid Program; Reassignment of Medicaid Provider Claims

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AMERICAN
OVERSIGHT

From: [Boston, Beverly A. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: FW: Request for clearance CMS-2413-P; Medicaid Program; Reassignment of Medicaid Provider Claims
Date: Tuesday, March 27, 2018 3:58:41 PM
Attachments: [CMS-2413-P ClearanceRegs \(03-23-18\).doc](#)
[CMS-2413-P Master \(03-23-18\).docx](#)
Importance: High

Per our discussion, OSORA is aware and moved CMS clearance to end on 3/30.

Beverly

From: CMS Coordination_Regs_OSORA
Sent: Tuesday, March 27, 2018 3:42 PM
To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Subject: Request for clearance CMS-2413-P; Medicaid Program; Reassignment of Medicaid Provider Claims
Importance: High

Please note: This clearance is now requested by Friday, March 30th. Sorry for any inconvenience.

~~Clearance is requested by Wednesday, April 4, 2018.~~

REMINDER: This information has not been publicly disclosed and may be privileged and confidential. **It is for internal government use only** and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

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CENTERS FOR MEDICARE & MEDICAID SERVICES
Office of Strategic Operations and Regulatory Affairs

REGULATIONS CLEARANCE REQUEST

Date to Clearance: 03/23/2018

DUE DATE: 04/04/2018

Originating Office: CMCS

File Code: CMS-2413-P

Subject: Medicaid Program; Reassignment of Medicaid Provider Claims

Target Publication Date: June 22, 2018

Urgency: This proposed rule would amend regulations to limit exceptions to provider payments under the Medicaid program.

Referred to:

C = Clearance	I = Informational
C	Center for Consumer Information and Insurance Oversight
C	Center for Clinical Standards and Quality
C	Center for Medicaid and CHIP Services
I	Center for Medicare and CHIP Services/Division of Tribal Affairs
C	Center for Medicare/Center for Medicare Management (CMM)
C	Center for Medicare/Center for Drug and Health Plan Choice (CPC)
C	Center for Medicare and Medicaid Innovation
I	Center for Program Integrity
I	Federal Coordinated Health Care Office
C	Office of the Actuary
I	Office of Communications
I	Office of Enterprise Data and Analytics
C	Office of Financial Management
C	Office of General Counsel
I	Office of Hearings and Inquiries
I	Office of Information Products and Data Analysis
I	Office of Information Technology
C	Office of Information Technology/Privacy
C	Office of Legislation
I	Office of Minority Health
I	Office of Operations Management
I	Office of Strategic Operations and Regulatory Affairs
I	Office of Strategic Operations and Regulatory Affairs/Records Management
C	Office of Strategic Operations and Regulatory Affairs/Paperwork Reduction Act
C	Office of Strategic Operations and Regulatory Affairs/Impact
I	Office of Strategic Operations and Regulatory Affairs/Program Coordinator

INSTRUCTIONS: Please discuss questions you have about the proposed regulation with Chris Thompson (6-4044) or Cynthia Lambert-Lawson (6-1366) (RDG) before transmitting comment memoranda. If issues cannot be resolved, non-concurrence memoranda must be signed by the Center or Office Director (or his/her designee). We appreciate your efforts to help us expedite your comments by presenting them in the following order: (1) Policy Issues, (2) Technical Issues, and (3) Editorial Comments.

	Cleared by:	Component	Date
Concur			/ /
Concur w/comments			/ /
Non-concur			/ /

Please send your clearances to the **CMS Coordination_Regs_OSORA** mailbox under All Users in Outlook. If you have questions concerning the document, please contact Yolanda Hayes, 410-786-7195, or Sharon Johnson, 410-786-9994.

EXT-18-0310-A-000465

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Cantwell, Kenya J. \(CMS/CMCS\)](#); [Harrison, Wendy L. \(CMS/CMCS\)](#); [Lollar, Ralph F. \(CMS/CMCS\)](#)
Cc: [Mikow, Asher S. \(CMS/CMCS\)](#); [Thrig, Jocelyn B. \(CMS/CMCS\)](#); [Lyles, Tia \(CMS/CMCS\)](#); [Johns, Hamilton J. \(CMS/CMCS\)](#); [Brown, Sharon J. \(CMS/CMCS\)](#); [Sabir, Jeremiah A. \(CMS/CMCS\)](#)
Subject: FW: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Date: Tuesday, November 6, 2018 4:38:00 PM
Attachments: [CMS-2413-F - 10.25.18 - DEHPG FMG Passback.docx](#)

Hi Melissa, Kenya, and Ralph,

I wanted to informally send you responses to your comments before submitting them to OSORA. Perhaps we can get together sometime tomorrow and walk through the responses.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: CMS Coordination_Regs_OSORA
Sent: Wednesday, October 31, 2018 10:22 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Subject: FW: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

From: CMS CMSO_REGS

Sent: Wednesday, October 31, 2018 9:34 AM

To: CMS Coordination_Regs_OSORA <Coordination_Regs_OSORA@cms.hhs.gov>

Cc: Taylor, Kenneth L. (CMS/CMCS) <Kenneth.Taylor@cms.hhs.gov>; Mannix, Norma J. (CMS/CMCS) <norma.mannix@cms.hhs.gov>; Kassel, Adeena (CMS/CMCS) <Adeena.Kassel@CMS.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>

Subject: RE: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Attached are CMCS' comments.

Comments are on the following pages.

Pages – 2, 7, 8, 9, 11, 12, 13, 17, 19, 20,

taAnna Meyers

Division of Operations and Executive Support

Center For Medicaid CHIP Services

410-786-5364

From: CMS Coordination_Regs_OSORA

Sent: Tuesday, October 23, 2018 5:06 PM

To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; CMS OLClearances <OLClearances@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

CMS-2413-F: Medicaid Program; Reassignment of Medicaid Provider Claims

Clearance is requested by 5 p.m., Tuesday, October 30, 2018.

REMINDER: This information has not been publicly disclosed and may be privileged and confidential. **It is for internal government use only** and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

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If you have any questions regarding submission of clearances and comments, you may contact **Cynthia Lambert-Lawson (x6-1366)**. Please call **Chris Thompson (X6-4044) for policy related questions.**

This final rule is scheduled for publication on November 30, 2018. Therefore, it is important that we receive all clearances timely. Thank you, in advance, for your prompt response.

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From: [Boston, Beverly A. \(CMS/CMS\)](#)
To: [Thompson, Christopher G. \(CMS/CMS\)](#)
Cc: [Fan, Kristin A. \(CMS/CMS\)](#); [Freeze, Janet G. \(CMS/CMS\)](#)
Subject: FW: Request for Reclearance of CMS-2413-P Reassignment of Medicaid Provider Claims
Date: Friday, April 6, 2018 11:41:01 AM
Attachments: [CMS-2413-P Clearance Regs \(04-05-18\).doc](#)
[CMS-2413-P Master \(04-05-18\).docx](#)
[CMS-2413-P Compare 4-5-18 to 3-23-18.docx](#)

Hi Chris,

As OSORA mentioned in a recent email, see below the PPR rule is in CMS re-clearance with a due date of 4/12.

Beverly

From: CMS Coordination_Regs_OSORA
Sent: Thursday, April 5, 2018 10:29 AM
To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Subject: Request for Reclearance of CMS-2413-P Reassignment of Medicaid Provider Claims

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If you have any questions regarding submission of clearances and comments, you may contact Cynthia Lambert-Lawson **(6-1366)**. Please call Chris Thompson **(6-4044)** for policy related questions.

This proposed rule is scheduled for publication on June 22, 2018. Therefore, it is important that we receive all clearances timely. Thank you, in advance, for your prompt response.

CENTERS FOR MEDICARE & MEDICAID SERVICES
Office of Strategic Operations and Regulatory Affairs

REGULATIONS CLEARANCE REQUEST

Date to Clearance: 04/05/2018

DUE DATE: 04/13/2018

Originating Office: CMCS

File Code: CMS-2413-P

Subject: Medicaid Program; Reassignment of Medicaid Provider Claims

Target Publication Date: June 22, 2018

Urgency: This proposed rule removes the regulation text that allows a state to make payments to third parties on behalf of an individual provider for benefits.

Referred to:

C = Clearance	I = Informational
I	Center for Consumer Information and Insurance Oversight
I	Center for Clinical Standards and Quality
I	Center for Medicaid and CHIP Services
I	Center for Medicare and CHIP Services/Division of Tribal Affairs
I	Center for Medicare/Center for Medicare Management (CMM)
I	Center for Medicare/Center for Drug and Health Plan Choice (CPC)
I	Center for Medicare and Medicaid Innovation
I	Center for Program Integrity
I	Federal Coordinated Health Care Office
C	Office of the Actuary
I	Office of Communications
I	Office of Enterprise Data and Analytics
C	Office of Financial Management
C	Office of General Counsel
I	Office of Hearings and Inquiries
I	Office of Information Products and Data Analysis
I	Office of Information Technology
I	Office of Information Technology/Privacy
C	Office of Legislation
I	Office of Minority Health
I	Office of Operations Management
I	Office of Strategic Operations and Regulatory Affairs
I	Office of Strategic Operations and Regulatory Affairs/Records Management
C	Office of Strategic Operations and Regulatory Affairs/Paperwork Reduction Act
C	Office of Strategic Operations and Regulatory Affairs/Impact
I	Office of Strategic Operations and Regulatory Affairs/Program Coordinator

INSTRUCTIONS: Please discuss questions you have about the proposed regulation with Chris Thompson (6-4044) or Cynthia Lambert-Lawson (6-1366) (RDG) before transmitting comment memoranda. If issues cannot be resolved, non-concurrence memoranda must be signed by the Center or Office Director (or his/her designee). We appreciate your efforts to help us expedite your comments by presenting them in the following order: (1) Policy Issues, (2) Technical Issues, and (3) Editorial Comments.

	Cleared by:	Component	Date
Concur	_____	_____	/ /
Concur w/comments	_____	_____	/ /
Non-concur	_____	_____	/ /

Please send your clearances to the **CMS Coordination_Regs_OSORA** mailbox under All Users in Outlook. If you have questions concerning the document, please contact Yolanda Hayes, 410-786-7195, or Sharon Johnson, 410-786-9994.

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From: meetings.cms.gov
To: [Thompson, Christopher C. \(CMS/QMCS\)](#)
Subject: Meeting Summary Report: PRR - Analysis of Themes
Date: Thursday, October 4, 2018 12:41:29 PM
Attachments: [prism-logo.png](#)
[company_logo.png](#)
[cisco.png](#)



Hi CHRISTOPHER THOMPSON,

Your meeting summary report:

Number:

(b)(6)

Topic:

PRR - Analysis of Themes

Start Time:

Oct 4, 2018 10:59 am

End Time:

Oct 4, 2018 12:31 pm

Invitees:

Sharon Brown, Asher MIKOW, Hamilton Johns, Jerimiah Sabir, Jocelyn Ihrig, Tia Lyles

Participants:

Sharon (Oct 4, 2018 11:08 am - Oct 4, 2018 12:25 pm)

CHRISTOPHER THOMPSON (Oct 4, 2018 11:07 am - Oct 4, 2018 12:31 pm)

Jocelyn Ihrig (Oct 4, 2018 11:06 am - Oct 4, 2018 12:31 pm)

Sharon (Oct 4, 2018 12:27 pm - Oct 4, 2018 12:31 pm)

Call-in numbers:

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From: meetings.cms.gov
To: [Thompson, Christopher C. \(CMS/QMCS\)](#)
Subject: Meeting Summary Report: PRR Comments and Responses
Date: Wednesday, October 10, 2018 4:52:00 PM
Attachments: [prism-logo.png](#)
[company_logo.png](#)
[cisco.png](#)



Hi CHRISTOPHER THOMPSON,

Your meeting summary report:

Number:

(b)(6)

Topic:

PRR Comments and Responses

Start Time:

Oct 10, 2018 3:02 pm

End Time:

Oct 10, 2018 4:38 pm

Invitees:

Hamilton Johns, Jerimiah Sabir, Sharon Brown, Tia Lyles, Jocelyn Ihrig, Asher MIKOW

Participants:

Sharon (Oct 10, 2018 3:07 pm - Oct 10, 2018 4:05 pm)

Jocelyn Ihrig (Oct 10, 2018 3:02 pm - Oct 10, 2018 4:07 pm)

Call-in numbers:

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From: meetings.cms.gov
To: [Thompson, Christopher C. \(CMS/QMCS\)](#)
Subject: Meeting Summary Report: PRR Comments and Responses
Date: Friday, October 5, 2018 4:04:56 PM
Attachments: [prism-logo.png](#)
[company_logo.png](#)
[cisco.png](#)



Hi CHRISTOPHER THOMPSON,

Your meeting summary report:

Number:

(b)(6)

Topic:

PRR Comments and Responses

Start Time:

Oct 5, 2018 1:56 pm

End Time:

Oct 5, 2018 3:52 pm

Invitees:

Jocelyn Ihrig, Asher MIKOW, Hamilton Johns, Jerimiah Sabir, Tia Lyles

Participants:

CHRISTOPHER THOMPSON (Oct 5, 2018 2:03 pm - Oct 5, 2018 3:50 pm)

Tia Lyles (Oct 5, 2018 2:03 pm - Oct 5, 2018 3:51 pm)

Sharon (Oct 5, 2018 2:33 pm - Oct 5, 2018 3:52 pm)

Jocelyn Ihrig (Oct 5, 2018 1:56 pm - Oct 5, 2018 3:52 pm)

Asher MIKOW (Oct 5, 2018 2:00 pm - Oct 5, 2018 3:52 pm)

Hamilton Johns (Oct 5, 2018 2:03 pm - Oct 5, 2018 3:52 pm)

Call-in numbers:

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From: meetings.cms.gov
To: [Thompson, Christopher C. \(CMS/QMCS\)](#)
Subject: Meeting Summary Report: PRR Comments and Responses
Date: Thursday, October 11, 2018 4:22:48 PM
Attachments: [prism-logo.png](#)
[company_logo.png](#)
[cisco.png](#)



Hi CHRISTOPHER THOMPSON,

Your meeting summary report:

Number:

(b)(6)

Topic:

PRR Comments and Responses

Start Time:

Oct 11, 2018 12:57 pm

End Time:

Oct 11, 2018 4:12 pm

Invitees:

Jocelyn Ihrig, Tia Lyles, Hamilton Johns, Jerimiah Sabir, Asher MIKOW, Sharon Brown

Participants:

CHRISTOPHER THOMPSON (Oct 11, 2018 1:06 pm - Oct 11, 2018 3:50 pm)

Jocelyn Ihrig (Oct 11, 2018 1:08 pm - Oct 11, 2018 3:59 pm)

Sharon Brown (Oct 11, 2018 1:10 pm - Oct 11, 2018 4:01 pm)

Asher MIKOW (Oct 11, 2018 1:19 pm - Oct 11, 2018 3:59 pm)

Hamilton Johns (Oct 11, 2018 1:07 pm - Oct 11, 2018 4:03 pm)

Jerimiah Sabir (Oct 11, 2018 1:09 pm - Oct 11, 2018 1:10 pm)

Jerimiah Sabir (Oct 11, 2018 1:11 pm - Oct 11, 2018 2:48 pm)

Jerimiah Sabir (Oct 11, 2018 2:54 pm - Oct 11, 2018 4:12 pm)

Tia Lyles (Oct 11, 2018 1:06 pm - Oct 11, 2018 4:12 pm)

Call-in numbers:

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From: meetings.cms.gov
To: [Thompson, Christopher C. \(CMS/QMCS\)](#)
Subject: Meeting Summary Report: PRR Themes
Date: Thursday, October 4, 2018 3:46:13 PM
Attachments: [prism-logo.png](#)
[company_logo.png](#)
[cisco.png](#)



Hi CHRISTOPHER THOMPSON,

Your meeting summary report:

Number:

(b)(6)

Topic:

PRR Themes

Start Time:

Oct 4, 2018 2:28 pm

End Time:

Oct 4, 2018 3:36 pm

Invitees:

Asher MIKOW, Sharon Brown, Jocelyn Ihrig, Hamilton Johns, Jeremiah Sabir, Tia Lyles

Participants:

Asher MIKOW (Oct 4, 2018 2:40 pm - Oct 4, 2018 3:10 pm)

Tia (Oct 4, 2018 2:36 pm - Oct 4, 2018 3:31 pm)

Hamilton Johns (Oct 4, 2018 2:38 pm - Oct 4, 2018 3:31 pm)

CHRISTOPHER THOMPSON (Oct 4, 2018 2:42 pm - Oct 4, 2018 3:36 pm)

Sharon Brown (Oct 4, 2018 2:29 pm - Oct 4, 2018 3:36 pm)

Jeremiah Sabir (Oct 4, 2018 2:36 pm - Oct 4, 2018 3:36 pm)

Jocelyn Ihrig (Oct 4, 2018 2:32 pm - Oct 4, 2018 3:36 pm)

Call-in numbers:

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From: [Baron, Evell J. \(CMS/OSORA\)](#)
To: [Baron, Evell J. \(CMS/OSORA\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#); [Brewer, Annette M. \(CMS/OSORA\)](#); [Brooks, Gavsha M. \(CMS/OSORA\)](#); [Bryman, Mitch \(CMS/OSORA\)](#); [Clybourn, Olen D. \(CMS/OSORA\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#); [Farrell, Caroline \(HHS/OGC\)](#); [Fultz-Mimms, Trenesha N. \(CMS/OSORA\)](#); [Garcia, Vanessa \(CMS/OSORA\)](#); [Harris, Shell E. \(CMS/OSORA\)](#); [Hubbard, Lisa A. \(CMS/OSORA\)](#); [Jones, Martique S. \(CMS/OSORA\)](#); [Lafferty, Tiffany B. \(CMS/OSORA\)](#); [Laib, Eric C. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#); [Miller, Ruth A. \(CMS/OSORA\)](#); [Phan, Thomas M. \(CMS/OSORA\)](#); [Slanskis, Jeremy D. \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: OGC Comments : Medicaid Provider Payment Reassignment NPRM
Date: Wednesday, June 20, 2018 10:10:02 AM
Attachments: [00394120 OGC NOTE 20180619 18-15771.pdf](#)
[00394120 CMS-2413-P Master OGC MARKUP 20180619 18-15771.docx](#)
Importance: High

OGC Comments are attached.

[A note from OS/ES regarding the FOP comments:](#)

I heard back from Kelly; she is booked solid again today.

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From: [Barco, Evell J. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: OMB Briefing Paper
Date: Wednesday, April 18, 2018 1:02:15 PM
Attachments: [Proposed Rule briefing paper for HHS principals briefing - CMS 2413-P Re....docx](#)

Hi Christopher,

We shared the HHS paper that you provided but no briefing was necessary. Now that HHS clearance is complete and we plan to send a revised rule back tomorrow I believe, we will also need to send a briefing paper to OMB. Attached is the HHS paper. Please let me know if the briefing paper needs to be updated before we move it to OMB. I look forward to hearing back from you. Feel free to contact me if you have questions.

Thanks.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, April 10, 2018 7:31 AM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: HHS Reviewers Briefing Paper

Good Morning Evell,

Attached is the version of the Reviewer's Briefing Paper that was cleared by the FMG front office.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410) 786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: [Barco, Evell J. \(CMS/OSORA\)](#)
To: [Boston, Beverly A. \(CMS/CMCS\)](#); [Brewer, Annette M. \(CMS/OSORA\)](#); [Brooks, Gaysha M. \(CMS/OSORA\)](#); [Bryman, Mitch \(CMS/OSORA\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#); [Farrell, Caroline \(HHS/OGC\)](#); [Fultz-Mimms, Trenesha N. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#); [Laib, Eric C. \(CMS/OSORA\)](#); [Popp, Dawn \(HHS/OGC\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Cc: [Jones, Martique S. \(CMS/OSORA\)](#); [Hubbard, Lisa A. \(CMS/OSORA\)](#); [Harris, Sheli E. \(CMS/OSORA\)](#); [Clybourn, Olen D. \(CMS/OSORA\)](#); [Phan, Thomas M. \(CMS/OSORA\)](#); [Miller, Ruth A. \(CMS/OSORA\)](#)
Subject: OMB Passback - Reassignment of Medicaid Provider Claims (CMS 2413-P)--CLEARANCE REQUEST
Date: Tuesday, June 26, 2018 4:32:13 PM
Attachments: [CMS-2413-P Master \(6-22-18\) passback.docx](#)
Importance: High

Hi,

OMB's passback is attached, with one reviewer outstanding so possibly more to come. These comments came from White House Counsel. Please transmit this to Kelly Cleary. Thanks.

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From: [Bryman, Mitch \(CMS/OSORA\)](#)
To: [CMS Coordination_Regs_OSORA](#); [CMS CMSO_REGS](#); [CMS OLClearances](#); [Thompson, Christopher C. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#); [Zhang, Nancy N. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#); [Brooks, Gaysha M. \(CMS/OSORA\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#); [Farrell, Caroline \(HHS/OGC\)](#)
Cc: [Brewer, Annette M. \(CMS/OSORA\)](#)
Subject: PRA Input > RE: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Date: Wednesday, October 24, 2018 1:52:00 PM
Attachments: [CMS-2413-F \(10-23-18\) \(rev 10-24-2018 OSORA PRA\).docx](#)

The attached sets out several PRA-related comments within the COI section.

Please let me know if you have any questions.

Thank you

-Mitch

From: CMS Coordination_Regs_OSORA
Sent: Tuesday, October 23, 2018 5:06 PM
To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; CMS OLClearances <OLClearances@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Subject: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Importance: High

CMS-2413-F: Medicaid Program; Reassignment of Medicaid Provider Claims

Clearance is requested by 5 p.m., Tuesday, October 30, 2018.

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Mack, Rosa \(CMS/CMCS\)](#)
Subject: Provider Reassignment Regulation - Draft Fact Sheet
Date: Wednesday, June 20, 2018 4:32:00 PM
Attachments: [PRR Fact Sheet 6-20-18.docx](#)

Hey Rosa,

I kept this short and simple and I am not certain there is much more that can be said here. Ironically, the language in the fact sheet tracks with the Q&A's.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, June 20, 2018 3:39 PM
To: Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>
Subject: FW: OGC Comments : Medicaid Provider Payment Reassignment NPRM
Importance: High

Hi Rosa,

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Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410) 786-4044
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From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, June 20, 2018 2:12 PM
To: Lynch, Calder (CMS/OA) <calder.lynnch@cms.hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>
Subject: FW: OGC Comments : Medicaid Provider Payment Reassignment NPRM
Importance: High

Good Afternoon Calder,

(b)(5)

Please advise as far as next steps.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: Barco, Evell J. (CMS/OSORA)

Sent: Wednesday, June 20, 2018 10:10 AM

To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA)

<Martique.Jones@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>;
Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA)
<Cynthia.Lambert-Lawson@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA)
<Ruth.Miller@cms.hhs.gov>; Phan, Thomas M.(CMS/OSORA) <Thomas.Phan@cms.hhs.gov>;
Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C.
(CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: OGC Comments : Medicaid Provider Payment Reassignment NPRM

Importance: High

OGC Comments are attached.

A note from OS/ES regarding the EOP comments:

I heard back from Kelly; she is booked solid again today.

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**Medicaid Program; Provider Reassignment Regulations (CMS-2413-P) Proposed Rule
Fact Sheet**

Overview

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#); [Brown, Sharon J. \(CMS/CMCS\)](#); [Sabir, Jeremiah A. \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#); [Johns, Hamilton J. \(CMS/CMCS\)](#)
Subject: Provider Reassignment Regulation CMS-2413-P Master .docx
Date: Wednesday, May 30, 2018 2:58:00 PM
Attachments: [CMS-2413-P Master .docx](#)

To aid with today's discussion.

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From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#)
Subject: PRR - Question 10 of OGC Comments - APA
Date: Thursday, November 15, 2018 9:50:39 AM
Attachments: [NWLC comments - CMS-2413-P \(Filed 8 13 18\).pdf](#)

Comment 6332

August 13, 2018

Submitted via www.regulations.gov

The Honorable Seema Verma, Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-2413-P, P.O. Box 8016
Baltimore, MD 21244-8016

RE: CMS-2413-P, Medicaid Program; Reassignment of Medicaid Provider Claims

Dear Ms. Verma:

The National Women's Law Center (the Center) writes in response to the above-referenced notice of proposed rulemaking (NPRM), issued by the Centers for Medicare and Medicaid Services (CMS) and published in the Federal Register on July 12, 2018, which would repeal a current regulatory provision clarifying that states may make deductions from provider payments for costs such as health care and skills training without violating the Medicaid prohibition on reassignment of provider claims at 1902(a)(32) of the Social Security Act.¹ The NPRM also indicates that CMS will newly apply the prohibition to authorized requests for deduction of union dues payments from certain Medicaid home care providers, singling out this type of deduction despite the fact that neither the statute nor regulations mention it. We strongly oppose this NPRM and urge CMS to withdraw it.

Since 1972, the Center has worked to remove barriers based on gender, to open opportunities for women and girls, and to help women and their families lead economically secure, healthy, and fulfilled lives. The Center advocates for improvement and enforcement of our nation's employment and civil rights laws, with a particular focus on the needs of low-income women and their families, communities of color, and others who face historic and systemic barriers to equality and economic security.

Our research at the Center affirms that, across industries, unions are one of the very best mechanisms to ensure that women are paid fair wages and have decent working conditions.² Union members typically make more per week than non-union workers—a wage advantage that is greater for women, both as a percentage and as absolute dollars, and is especially large for Latina women.³ For home care workers, the ability to choose to join a union and opt to have dues deducted from their paychecks not only ensures this historically marginalized workforce has the same access to union membership as other private and public sector workers who can do so, but also has led to

¹ Medicaid Program; Reassignment of Medicaid Provider Claims, 83 Fed. Reg. 32,252 (proposed July 12, 2018) (to be codified at 42 C.F.R. pt. 447).

² See generally Kayla Patrick & Sarah David Heydemann, Nat'l Women's Law Ctr. (NWLC), Union Membership Is Critical for Equal Pay (March 2018), <https://nwlc-ciaw49tixgw5lbab.stackpathdns.com/wp-content/uploads/2016/02/Union-Membership-is-Critical-for-Equal-Pay-2018.pdf>.

³ *Id.* at 2.

improvements to workforce standards that have improved the lives of home care providers and strengthened Medicaid home and community-based services (HCBS) programs. The proposed rule would reverse that progress and represents an attack on a specific group of workers—almost all of whom are women, and the majority of whom are women of color: Black women make up one-quarter of the home care workforce, Latinas are about one-fifth, and Asian women and women of other races make up another 8 percent, while white women are just over one-third of the workforce.⁴

Apart from the substance of the proposal, we are also troubled by the process that produced this NPRM. CMS is proposing an action that completely reverses its own recent policy, and acknowledges that the proposed rule could be economically significant—yet the proposal includes extremely minimal discussion of the agency’s rationale for the change and virtually no analysis of its economic and other impact. And with a public comment period of just 30 days, hundreds of thousands of workers who will be affected by the proposed rule will have little time to provide input. For these reasons, explained in further detail in the comments that follow, we urge CMS to withdraw its proposed rule.

I. Women—especially women of color—are serving the growing need for Medicaid home and community-based services, but their work remains undervalued and underpaid.

Women make up close to 90 percent of home care workers, who assist older adults and people with disabilities with bathing, toileting, medication management, and other vitally important functions that allow them to live independently at home.⁵ Women of color make up the largest and fastest-growing segment of the workforce in this field,⁶ which will add more jobs to our economy than any other occupation over the next decade as our population ages.⁷

Medicaid, in particular, is a major job creator for women, especially women of color, working in home care.⁸ In recent decades, the proportion of total Medicaid spending on long-term services and supports (LTSS) devoted to home and community-based services (HCBS) has grown from a level of less than ten percent in the early 1980s to more than half (53 percent in 2014) of Medicaid LTSS spending,⁹ in response to both changing consumer preferences and legal decisions.

HCBS programs cannot function without home care workers; without a worker there is no access to care. Yet the women who perform this vitally important and demanding work often struggle to make ends meet and support their own families. The professional care work performed by women, specifically

⁴ Paraprofessional Healthcare Inst. (PHI), *Racial and Gender Disparities Within the Direct Care Workforce: Five Key Findings*, at 6 (Nov. 2017), available at <https://phinational.org/resource/racial-gender-disparities-within-direct-care-workforce-five-key-findings/> [hereinafter PHI, *Racial and Gender Disparities*].

⁵ PHI, *U.S. Home Care Workers: Key Facts*, at 3-4 (Sept. 2017), available at <https://phinational.org/resource/u-s-home-care-workers-key-facts/> [hereinafter PHI, *Key Facts*].

⁶ PHI, *Racial and Gender Disparities*, *supra* note 4, at 5.

⁷ PHI, *Key Facts*, *supra* note 5, at 7. See also Kayla Patrick, Meika Berlan & Morgan Harwood, NWLC, *Low-Wage Jobs Held Primarily by Women Will Grow the Most Over the Next Decade* (Aug. 2018), <https://nwlc-ci49tixgw5lbab.stackpathdns.com/wp-content/uploads/2016/04/Low-Wage-Jobs-Held-Primarily-by-Women-Will-Grow-the-Most-Over-the-Next-Decade-2018.pdf>.

⁸ See generally NWLC, *Medicaid Is Vital for Women’s Jobs in Every Community* (June 2017), <https://nwlc-ci49tixgw5lbab.stackpathdns.com/wp-content/uploads/2017/06/Medicaid-Jobs-Report.pdf>. See also PHI, *Key Facts*, *supra* note 5, at 4.

⁹ Audra Wenzlow et al., *Improving the Balance: The Evolution of Medicaid Expenditures for Long-Term Services and Supports (LTSS), FY 1981-2014* (June 2016), <https://www.medicaid.gov/medicaid/ltss/downloads/evolution-ltss-expenditures.pdf>.

including the care work done by women of color, has long been undervalued in the United States, and our policies and institutions have too often reinforced this problem rather than rectifying it. The treatment of care work performed inside the home is emblematic of this phenomenon; domestic workers were excluded from the National Labor Relations Act enacted in 1935 and from the Fair Labor Standards Act enacted in 1938, and even today lack legal protections afforded to most other working people.¹⁰

Regulations finally extending federal minimum wage and overtime protections to home care workers only went into effect in 2015,¹¹ and median wages for home care workers remain below \$11 per hour.¹² Due to inconsistent hours that often accompany these low wages, the median annual income for home care workers is just \$13,800; nearly one-quarter of home care workers live in households with incomes below the federal poverty line.¹³ Women of color in home care jobs are even more likely to live in poverty and rely on public assistance than home care workers who are men or white women.¹⁴

These conditions harm the women who dedicate their lives to caring for others—and harm the consumers for whom they care (most of whom are also women¹⁵) by increasing turnover and discouraging entry into the home care field at a time when the demand for services is growing rapidly. The vast majority of states have already reported “serious” or “very serious” shortages in the home care workforce generally,¹⁶ and the shortage of workers has affected Medicaid HCBS programs as well as the broader market for some time. A 2008 Institute of Medicine (IOM) report that examined the direct services workforce, including home and personal care workers, found that “a major factor in the deficit of direct care workers is the poor quality of these types of jobs,” noting that “much more needs to be done to enhance to the quality of these jobs.”¹⁷ The IOM report identified a number of issues that

¹⁰ See generally Julie Vogtman, NWLC, *Undervalued: A Brief History of Women’s Care Work and Child Care Policy in the United States* (Dec. 2017), https://nwlc-ci49tixgw5lbab.stackpathdns.com/wp-content/uploads/2017/12/final_nwlc_Undervalued2017.pdf. See also, e.g., Andrea Flynn, Roosevelt Inst. & Ms. Foun. For Women, *Justice Doesn’t Trickle Down: How Racialized and Gendered Rules Are Holding Women Back*, at 36 (May 2017), <https://forwomen.org/wp-content/uploads/2017/05/Justice-Doesnt-Trickle-Down-FINAL.pdf>; Premilla Nadasen & Tiffany Williams, Barnard Ctr. for Research on Women, *Valuing Domestic Work*, at 4-5, <http://bcrw.barnard.edu/wp-content/nfs/reports/NFS5-Valuing-Domestic-Work.pdf>; Linda Burnham & Nik Theodore, *Home Economics: The Invisible and Unregulated World of Domestic Work*, at 8-9 (2012); Eileen Boris & Jennifer Klein, *Caring for America: Home Health Workers in the Shadow of the Welfare State* (Oxford Univ. Press, 2012); Brief of Women’s Rights, Civil Rights, and Human Rights Organizations and Scholars as *Amici Curiae* supporting defendants-appellants seeking reversal in *Home Care Assoc. of America et al. v. David Weil et al.*

¹¹ See Application of the Fair Labor Standards Act to Domestic Service; Final Rule, 78 Fed. Reg. 60,454 (Oct. 1, 2013) (to be codified at 29 C.F.R. pt. 552). The effective date of this final rule was January 1, 2015, but litigation delayed enforcement until November 2015. See U.S. Dep’t of Labor, Wage & Hour Div., *Home Care: U.S. Court of Appeals Unanimously Upheld DOL Rule, Opinion Effective as of Oct. 13, 2015*, <https://www.dol.gov/whd/homecare/litigation.htm> (last visited Aug. 12, 2018).

¹² PHI, Key Facts, *supra* note 5, at 5.

¹³ *Id.* at 5.

¹⁴ PHI, Racial and Gender Disparities, *supra* note 4, at 4.

¹⁵ See, e.g., Ari Houser, AARP Public Policy Inst., *Women & Long-Term Care* (2007), https://assets.aarp.org/rgcenter/il/fs77r_ltc.pdf.

¹⁶ PHI & Direct Care Workers Assoc. of North Carolina, *The 2007 National Survey of State Initiatives on the Direct-Care Workforce*, at 2 (Dec. 2009).

¹⁷ Inst. of Medicine, *Retooling for an Aging America*, at 200-201 (2008), available at <http://www.nationalacademies.org/hmd/reports/2008/retooling-for-an-aging-america-building-the-health-care-workforce.aspx>.

contribute to this poor job quality, including low salaries, lack of benefits, high levels of physical and emotional stress, and job-related injuries.

II. Unions improve job quality for home care workers and care quality for HCBS program beneficiaries—but the proposed rule threatens this progress.

The low wages and lack of benefits typical of the industry makes it especially critical that home care workers be able to come together to demand better conditions. Unions have played a key role in helping address these issues by raising wages through the collective bargaining process and advocacy to increase Medicaid funding and payment rates, as well as providing opportunities for home care workers to share their experiences with each other and creating a mechanism to provide workers with a voice in decisions that affect them. One study that examined outcomes for 18,000 home care workers in San Francisco over the years 1996-2002, after workers won substantial wage increases through their union, found a significant decrease in turnover associated with the pay increase.¹⁸ A recent survey from the National Employment Law Project confirms that home care workers who are in unions are paid more, and are far more likely to have access to health insurance and paid time off, than their non-union counterparts.¹⁹ Decent wages and benefits for home care workers reduce turnover, improving quality and continuity of care for the people home care workers serve.²⁰

Home care worker unions play a vitally important role, too, in providing a voice for a workforce that historically has lacked one. This is particularly true in the case of the individual provider (IP) home care workers to whom the proposed rule applies. IP home care workers may experience even greater isolation and be regarded as less “professional” than home care workers employed by agencies, who typically had somewhat better access to standard employment benefits, such as health benefits, in the years before independent providers formed unions.²¹

In states where home care workers have formed unions, providers employed by home care agencies are able to join a union and collectively bargain with the agency under the federal National Labor Relations Act (NLRA). But in the self-directed models of HCBS, under which consumers retain greater power to hire and direct services, IP home care providers contract directly with the state, and these workers do not have the same collective bargaining rights under the NLRA. Instead, a number of states have created structures—such as a state authority—to allow IPs to join together in a union. In this case, the state is authorized to deduct a portion of an IP home care worker’s service payment for dues and any other benefits, in the same way that home care agencies make these deductions for workers they employ.

Enabling IP home care workers to make dues deductions thus provides an important measure of parity with agency home care and other institutional direct care workers who provide similar or identical services, and states’ adoption of these structures is part of a larger set of policies needed to remedy the historically unjust treatment of this particular group of workers. CMS has previously recognized the

¹⁸ Candace Howes, *Living Wages and Retention of Homecare Workers in San Francisco*, 44 Ind. Rel. 139 (2004).

¹⁹ Anastasia Christman & Caitlin Connolly, Nat’l Emp. Law Project, *Surveying the Home Care Workforce* (Sept. 2017), <https://www.nelp.org/publication/surveying-the-home-care-workforce/>.

²⁰ See Howes, *supra* note 18, and Candace Howes, *Upgrading California's Home Care Workforce: The Impact of Political Action and Unionization*, UC Berkeley: Univ. of California Institute for Labor & Emp. (2004), available at <https://escholarship.org/uc/item/1h28v106>.

²¹ See, e.g., Jane Tilly & Joshua M. Wiener, Urban Inst., *Consumer-Directed Home and Community Services: Policy Issues*, at 13 (Jan. 2001), <https://www.urban.org/sites/default/files/publication/61071/310065-Consumer-Directed-Home-and-Community-Services.PDF>.

ability of home care workers to make deductions for health care and union dues, and the role of home care worker unions, in helping to stabilize the workforce and ensure access to quality services, both in the 2014 rule clarifying the legitimacy of these payments²² and more recently in a 2016 Informational Bulletin that focused on strengthening the Medicaid home care workforce, pointing to the role of unions in supporting worker training and development.²³

In reversing its recent position and proposing to now apply a Medicaid payment rule that (as detailed below) was never intended to reach this group of workers or their union dues, CMS seeks to exploit the unique employment and payment structure of IP home care providers to erect new barriers to union membership, threatening to reverse the progress that has been made and to once again relegate IP home care workers to second-tier status. In so doing, it risks harming not only the workers, but also the consumers who depend on them.

III. CMS has not articulated any reasonable justification for this rulemaking.

CMS provides little rationale for the NPRM beyond an apparently new “concern” that the provision is “overbroad, and insufficiently linked to the exceptions expressly permitted by the statute.”²⁴ We address this misplaced concern in the section below, but must also note that the lack of reasoned explanation from CMS that one would expect to see in the preamble to a rule, particularly one seeking to completely repeal current established policy that was last reviewed by the agency relatively recently, reinforces our impression that the proposal is in fact a transparent attempt to erect barriers to union membership—one that may well render the agency’s actions arbitrary and capricious under the Administrative Procedure Act.²⁵

A. CMS’ characterization of the current payment structure is incorrect and misleading.

While the NPRM itself lacks discussion of CMS’ motivation, the press release CMS issued to announce the NPRM is rather more explicit: it notes that the rule will end the ability of states to “divert Medicaid payments away from providers” and claims that the rule is “designed to ensure that taxpayer dollars dedicated to providing healthcare services for low-income vulnerable Americans are not siphoned away for other purposes.”²⁶ These claims echo the contention of Senator Ron Johnson, in a letter he sent to CMS and in a follow-up staff report from the Committee on Homeland Security and Government Affairs, that states are “skimming” dues from Medicaid payments that would otherwise go to provide care for

²² See Medicaid Program; State Plan Home and Community-Based Services, 5-Year Period for Waivers, Provider Payment Reassignment, and Home and Community-Based Setting Requirements for Community First Choice and Home and Community-Based Services (HCBS) Waivers; Final Rule, 79 Fed. Reg. 2,948, 3,002 (Jan. 16, 2014) (to be codified at 42 C.F.R. pts. 430, 431, 435, et al.) (“Direct payment of funds by states to third parties on behalf of practitioners, to ensure benefits that support those practitioners and provide skills training, may help ensure that beneficiaries have greater access to such practitioners and higher quality services.”).

²³ U.S. Dep’t of Health & Human Servs., Ctrs. for Medicare & Medicaid Servs., CMCS Informational Bulletin: Suggested Approaches for Strengthening and Stabilizing the Medicaid Home Care Workforce (Aug. 3, 2016), available at <https://www.medicaid.gov/federal-policy-guidance/downloads/cib080316.pdf>.

²⁴ 83 Fed. Reg. 32,253.

²⁵ See 5 U.S.C. § 706(2)(A).

²⁶ Press Release, CMS Proposes Rule Change to Protect Medicaid Provider Payments (Jul. 10, 2018), <https://www.cms.gov/newsroom/press-releases/cms-proposes-rule-change-protect-medicaid-provider-payments>.

Medicaid recipients.²⁷ The NPRM's regulatory impact analysis reflects a similar interpretation, suggesting for instance that states may be increasing reimbursement levels in order to reassign portions of the provider payment to a third party and that they may lower those rates if providers are no longer able to deduct payments for union dues or other benefits.²⁸

This description of the flow of dollars under current payment arrangements is a gross mischaracterization that at best reflects a profound lack of understanding of IP home care payment structures and at worst is deliberately misleading. Deductions made by states on behalf of home care workers for dues and other costs, such as health benefits, do not “divert” or “siphon” Medicaid dollars from any state Medicaid program. Rather, IP home care workers receive payments from state Medicaid programs for services they provide to home care consumers—payments that function just like hourly wage payments that an agency-employed home care worker receives from her employer. While in the latter case the Medicaid program payment is made to the agency rather than directly to an IP home care worker, there is virtually no difference from the worker perspective; in both cases, home care workers are receiving payments for services provided to Medicaid beneficiaries. And in both cases there can be no “diversion” because the amount deducted for dues comes from the payment for services that has been made to the home care worker, who then voluntarily chooses to direct it to a union and/or for other benefits. If the worker chooses not to be a member of a union and authorize dues deduction, she keeps the full payment for the home care work she has already performed; it is not suddenly available for new spending. Medicaid expenditures and the amount spent on care remain the same. Funds are not “siphoned” from health care services by honoring the worker’s decision to deduct union dues from her pay, just as she does not “siphon” Medicaid money by spending her pay on rent or groceries.

B. *The anti-reassignment provision does not apply to home care provider union dues deductions.*

An examination of the history of the statutory provisions clearly shows that when Congress adopted the Medicaid anti-reassignment provision (1902(a)(3)) in 1972, it did so to address concerns about the practice of “factoring,” under which physicians and other providers assigned their payment claims to a third party, such as a collection agency—a practice that Congress recognized had led to “incorrect and inflated claims for services and...created administrative problems with respect to determinations of reasonable charges and recovery of overpayments.”²⁹ Neither the statute nor the relevant regulations say anything about unions or dues deductions; moreover, courts have uniformly concluded that similar arrangements, where funds are automatically transferred to a third party (such as so-called “double lockbox” arrangements used to convey Medicaid provider payments to a third party pursuant to the provider’s standing instructions) are valid so long as they are consistent with the purposes of the statute.

Thus, while CMS in its 2012 NPRM identified the new section 447.10(g)(4) as an “additional exception,” it clarified that allowing states to claim as provider payment amounts that are not directly paid to the

²⁷ See Letter from Senator Ron Johnson to Seema Verma, Administrator, Ctrs. for Medicare & Medicaid Servs. (Apr. 30, 2018), available at <https://www.hsgac.senate.gov/imo/media/doc/2018%2004%2030%20RHJ%20to%20CMS%20re%20Dues%20Skimming.pdf>.

²⁸ 83 Fed. Reg. 32,253-54.

²⁹ S. Rep. No. 982-1280, at 204-205 (1972).

provider, but are withheld and paid on behalf of the provider, is “not . . . within the intended scope of the statutory direct payment requirement.”³⁰ More specifically:

We propose to interpret the scope of the direct payment provision to not include the circumstance when the Medicaid program operates as a primary payer for a class of practitioners, and assumes the ordinary responsibilities required in that circumstance to assure workforce stability and quality. This exception from the scope of the direct payment provision would be limited to situations in which payment is made under a State law that authorizes payments on behalf of an individual practitioner to a third party for health and welfare benefit costs, training costs, or other benefits customary for employees. The legislative history of section 1902(a)(32) of the Act indicates that such a situation is not within the scope of “assignments” or “powers of attorney” that were considered at the time, or even of the same nature. Instead, such payments are more of an ordinary arrangement to further workforce stability and quality.³¹

Indeed, an IP home care provider’s authorized deduction of union dues or other benefit payments from her paycheck should not require a statutory exception to the anti-reassignment provision because such a deduction does not constitute a reassignment. Wages paid by the Medicaid program to a home care worker no longer belong to Medicaid—they belong to the worker,³² who can spend them as she sees fit, just like anyone else gets to make choices about spending their paycheck. Home care workers who have their union dues payment deducted automatically are the same as other people who have their union dues deducted from their wages, including other public employees like teachers, police officers and firefighters, whose dues also come from wages paid by the state.

Not surprisingly, then, the practice of states making deductions for union dues and other costs, such as health care, on behalf of independent home care providers existed well before 2014, starting with voluntary dues deduction arrangements in some California counties in the mid-1990s. CMS leaders under several previous administrations were aware of and did not oppose the practice. The language added by CMS in 2014 merely clarified that deductions from independent provider home care workers’ pay for “benefits customary for employees” are permissible, and not within the intended scope of the statutory language. Yet the NPRM now singles out dues deductions to unions as the sole example of a practice that will be implicated by the new rule. This amounts to a substantial policy shift for which CMS provides no legitimate legal or policy rationale, and one that will have a major impact on states, providers and consumers who have built consumer directed programs in reliance on CMS’s position that payments like those described in 2014 regulation are allowable.

IV. CMS’s analysis of the regulatory impact is insufficient.

Executive Orders 12866 and 13563 direct agencies to perform cost benefit analyses of proposed regulations and to select regulatory approaches that maximize net benefits, “including potential economic, environmental, public health and safety, and other advantages; distributive impacts; and

³⁰ Medicaid Program; State Plan Home and Community-Based Services, 5-Year Period for Waivers, Provider Payment Reassignment, and Setting Requirements for Community First Choice; Proposed Rule, 77 Fed. Reg. 26,362, 26,382 (proposed May 3, 2012) (to be codified at 42 C.F.R. pts. 430, 431, 435, et al.).

³¹ 77 Fed. Reg. 26,393.

³² See Benjamin Sachs, *Hypocrisy on Agency Fees: Why the CMS Home Care Rule Is Arbitrary and Capricious*, On Labor (Jul. 13, 2018), <https://onlabor.org/hypocrisy-on-agency-fees-why-the-cms-home-care-rule-is-arbitrary-and-capricious/>.

equity.”³³ The criteria for determining whether a rule can be considered economically significant takes into account not only the impact of the regulation on the economy as measured in dollar terms, but also broader effects: “Costs and benefits shall be understood to include both quantifiable measures (to the fullest extent that these can be usefully estimated) and qualitative measures of costs and benefits that are difficult to quantify, but nevertheless essential to consider.”³⁴ Yet not only is CMS unable to provide an analysis of the direct dollar impact of the regulation—acknowledging that it lacks sufficient data and relying on assertions from a single newspaper article to support a speculative and preliminary estimate³⁵—the NPRM also lacks any discussion of the broader impact of the rule.

Given the important role of unions in raising standards for the home care workforce, it stands to reason that curtailing the ability of workers to participate in unions through inappropriate application of the reassignment prohibition will have an adverse impact on them. A full analysis of economic impact would also consider the effect on GDP of workers leaving paid work to care for family members because no provider is available due to increased worker shortages. The failure to even attempt such an analysis runs counter to CMS’s obligations under the relevant rulemaking authorities. We urge CMS to provide a full analysis of the impact that hindering the ability of home care workers to participate in a union or pay for benefits such as health care will have on worker turnover, access to services, and quality of care.

* * *

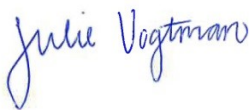
Our nation needs a high-quality, stable home care workforce to meet the demand that will continue to grow as our population ages. Given the need to strengthen and build the supply of home and community-based services through the Medicaid program, it is counterproductive to erect new and unwarranted barriers to union membership for a workforce led by women—especially women of color—who seek to benefit from the power of collective action. For the reasons set forth above, the National Women’s Law Center strongly urges the Department to withdraw the proposed rule.

Thank you for the opportunity to submit comments on this NPRM. Please do not hesitate to contact Julie Vogtman, Director of Job Quality and Senior Counsel (jvogtman@nwlc.org/202.588.5180) if you have questions or require additional information regarding these comments.

Sincerely,



Emily Martin
Vice President for Education & Workplace Justice



Julie Vogtman
Director of Job Quality and Senior Counsel

³³Exec. Order No. 12866, 58 Fed. Reg. No. 190 (Oct. 4, 1993) (section 1(a)). *See also* Exec. Order No. 13563, 76 Fed. Reg. 3,821 (Jan. 21, 2011).

³⁴ *Id.*

³⁵ 83 Fed. Reg. 32,254.

From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#)
Subject: PRR - Question 17 about elimination of ability to join health plan
Date: Thursday, November 15, 2018 11:11:35 AM
Attachments: [Comment 2124.pdf](#)

Comment 2124

County of Santa Clara

Office of the County Executive

County Government Center, East Wing
70 West Hedding Street
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August 8, 2018

The Honorable Seema Verma
Administrator, Centers for Medicare and Medicaid Services
Centers for Medicare and Medicaid Services
Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244-1850

RE: CMS-2413-P
Medicaid Program; Reassignment of Medicaid Provider Claims Proposed Rule

Dear Administrator Verma:

On behalf of the County of Santa Clara, I submit this letter to provide comment on the Centers for Medicare and Medicaid Services (CMS) proposed rule related to the Medicaid Program; Reassignment of Medicaid Provider Claims. The rule would alter the regulatory text that allows a state to make payments to third parties on behalf of an individual provider for benefits such as health insurance, skills training, and other benefits customary for employees. The proposed rule is overly broad and could interfere with health care and other benefits to In-Home Supportive Services (IHSS) providers. Additionally, the text of the proposed rule makes it clear that CMS does not know what its impact would be or provide any justification for the proposed change. Finally, payroll deductions and payments to vendors for benefits are not a "reassignment" and do not violate the law. California provided these deductions before the 2014 rule clarified such practices; the County believes the state has the legal authority to continue such deductions in the future.

The County is concerned that the rule could be interpreted to interfere with the ability to deduct for health care and other benefits, which would affect IHSS providers, IHSS consumers – who are aged, unwell and in need of assistance, as well as the County organization.

The County's Social Services Agency (SSA) administers the In-Home Supportive Services (IHSS) program. The program helps eligible aged, blind, or disabled people

safely remain in their homes when they can no longer fully care for themselves. IHSS consumers receive services, such as domestic and personal care assistance, solely through independent providers. In our County, we currently have 24,063 IHSS consumers who receive services from 24,324 full-or part-time providers.

Providers who work at least 35 hours per month for two consecutive months may be eligible for benefits, including medical, dental, and vision insurance. Providers who receive health benefits pay an insurance premium of \$25 per month and coverage is through Valley Health Plan (VHP), the County's health plan. VHP's employer group includes approximately 11,000 IHSS providers, which is more than half of the entire employer group. Monthly, VHP receives \$8.5 million in revenue from all sources – federal, state, county – for the coverage of IHSS providers.

VHP's current staffing model is built upon providing services to 20,000 employer group members. The loss of members and revenues if the proposed rule interferes with health care deductions is significant and may require reshuffling or layoff of County staff who provide these services.

The County also pays for and issues Valley Transportation Agency (VTA) SmartPasses to IHSS providers. The SmartPass allows unlimited rides on VTA buses and light rail. All IHSS providers are eligible for the SmartPass and in Fiscal Year 2017-18, 4,752 unique IHSS providers took at least one ride on the VTA system and more than 647,469 boardings were made by these individuals.

The SmartPass provides access to public transportation and transit for the IHSS workforce. Many IHSS providers rely on the pass to utilize the VTA transportation system. Without the pass, they would need to purchase their own SmartPass, which could be cost prohibitive for many. Without transportation, they would no longer be able to travel to the homes of IHSS clients to work.

The County has a robust homecare worker training program in place for IHSS providers. Fifteen different class curriculums have been developed specific to this workforce and focused on IHSS as a consumer directed model of care. Over the course of a year, 120 classes are offered to improve the skills of those providing services for the County's consumers.

A well-trained workforce is crucial to provide appropriate consumer care and result in a successful program. Training increases job satisfaction and worker morale. Further, trained employees are motivated to perform at or above expected levels. If the rule adversely impacts the IHSS homecare worker training program, provider turnover and fatigue are likely to increase.

The County's public hospital, Santa Clara Valley Medical Center, could be impacted if the rule interferes with the ability of IHSS providers to receive health coverage. There would be a loss of revenue to the system if the IHSS workforce no

longer has health coverage. Uninsured IHSS members would likely receive a majority of their care through emergency or urgent care departments, creating additional strain on the County's safety net health services. Also, higher enrollment in Medi-Cal is possible.

Additionally, the ability to recruit and retain IHSS providers would be limited if the rule interferes with the ability to provide a benefit package. The pay is relatively low, especially in Santa Clara County where the cost of living is high. But the low pay is partially offset by the value of the offered benefits.

The consequences of the cumulative effects to IHSS clients are unavoidable and severe. IHSS clients depend on the personal care and assistance they receive from IHSS providers to remain in their homes. Without home-based assistance, they would need to move to a nursing facility for care. Nursing facility care is a more expensive Medicaid benefit than home health services and would require the patient to provide a share of cost. The proposed rule would unravel the system that provides care to individuals who are aged, blind, or disabled and ultimately reduce their quality of life.

To restate, the proposed rule is overly broad and could interfere with health care, transportation, and other benefits to IHSS providers. If the rule interferes with these benefits, it will impact the IHSS consumers who depend on the personal care and assistance they receive from IHSS providers to remain in their homes. Without home-based assistance, IHSS consumers would be at risk for requiring nursing home care. Nursing facility care is a more expensive Medicaid benefit than home health services and would require the patient to provide a share of cost.

The County urges the Centers for Medicaid and Medicare Services (CMS) to reconsider proceeding with a rule without knowing the impact would or providing any justification for the proposed change. It is risky to propose a change without understanding the impacts, particularly to the quality of life for individuals who are aged, blind, or disabled.

Finally, payroll deductions and payments to vendors for benefits are not a "reassignment" and do not violate the law. California provided healthcare deductions before the 2014 rule clarified such practices; the County believes the state has the legal authority to continue such deductions in the future. Further, deductions by members for healthcare are not "assignments" and do not violate the law. Congress never intended to affect healthcare deductions with the anti-reassignment provision. The law was meant to stop the practice of "factoring," where Medicaid providers assigned their Medicaid service payments to collection agencies that would then inflate claims and collect payment from the federal government. Neither the statute nor the regulatory language mention anything about paycheck deductions.

It is for this reason and the other detrimental effects it would have on providers, the County, and clients, we urge the proposed rule to be withdrawn.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey V. Smith', with a stylized flourish extending to the right.

Jeffrey V. Smith, M.D., J.D.
County Executive

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Fan, Kristin A. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#)
Subject: PRR - Summary of Comments
Date: Friday, October 19, 2018 12:52:00 PM
Attachments: [PRR_High_level_comments_summary_10.19.18.docx](#)

Hey Kristin and Janet,

I believe Calder asked about a updated analysis of the PRR Comments.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
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Provider Reassignment Regulation (CMS-2413-P)
Summary of Public Comments
As of 10/19/18

Total Commenters = 7,182

Unique Commenters = 2,261

Comments Analyzed = 7,166

Out of Scope Comments = 16

States = 14 (Including the counties of Alameda and Santa Clara, CA)

Individuals = 6,910 (Including providers)

Organizations = 158 (Including Provider Advocacy Groups)

Political Comments = 26 (Both State and Federal Representatives)

Unions = 58 (SEIU and AFSCME)

Major Themes:

In Support of the proposed rule:

- *Many commenters highlighted the union dues skimming aspect of the proposed rule.*
- *Several commenters referenced recently signed legislation in both Minnesota and Washington that would automatically make home care providers union members.*

In opposition of the proposed rule:

- *One commenter suggested making all provider reassignments voluntary.*
- *Several commenters indicated that implementation of this proposed rule would negatively impact access to and quality of home care services.*
- *Several commenters highlighted the fact the CMS did not have enough data to determine the economic significance associated with rescinding 42 CFR 447.10(g)(4), yet the Agency chose a 30 day comment period. There were no comments that provided specific detail/analysis regarding the economic significance of this rule.*
- *Several commenters suggested implementation of this proposed rule runs counter to state flexibility.*

National Organizations:

- The National Association of States United for Aging and Disabilities (NASUAD) suggested adding additional language to the rule to specifically allow for the option to deduct finance cost associated with self-directed care, including fiscal intermediary services, payroll taxes, and other necessary expenses.

Provider Reassignment Regulation (CMS-2413-P)

Summary of Public Comments

As of 10/19/18

Congressional Comments:

- Senators Ron Johnson (WI) and Rep. Matt Dean of the Minnesota House of Representatives provided comments in support of the proposed rule.
- All other comments from Congress were in opposition of the rule. The reasons for opposition include:
 - *The use a 30 day comment period*
 - *The lack of any meaningful or quantitative analysis of the costs associated with this rule.*
 - *The potential negative impact on access to and quality of home and community-based services.*

State-submitted comments:

Analysis has yielded comments from the following states:

California:

Comments were received from the CA Dept. of Social Services, CA Office of the Attorney General (See legal comments below), and the CA State Controller's Office.

The CA Dept. of Social Services believes the rule will unnecessarily increase the amount of administrative burden and cost on consumers, providers, and the health care delivery system.

Pennsylvania:

The PA Dept. of the Auditor General questions the validity of the \$8 million amount that factored into the calculation of the economic significance of \$0 – \$160 million. The Auditor also noted that PA does not require mandated deductions of union dues.

New York:

The New York City Department of Consumer Affairs indicated that the proposed rule would undermine the financial and employment security of thousands of home care workers and would negatively impact access to services.

Massachusetts:

The Massachusetts State Medicaid Agency requested CMS to clarify that the proposed rule would not affect a state's authority to perform or secure Financial Management Services in connection with a state plan-based program.

Write-in Campaigns – California, Washington, Florida

Individuals overwhelmingly opposed the proposed rule. These form letters cite CMS's overreach of authority designed to attack home care workers and their freedom to spend their wages as they choose.

Considerations for OGC:

Provider Reassignment Regulation (CMS-2413-P)
Summary of Public Comments
As of 10/19/18

FMG worked with OGC with regard to comments that address the legal aspects of the proposed rule. Analysis has yielded the following comments that fall into this category:

- This proposed rule undermines an individual's first amendment right to support unions.
- This proposed rule violates individual's civil rights.
- Submitted by Matt Dean of the MN House of Representatives: Minnesota's Medicaid program lacks statutory authority to appropriate federal law prohibits the described appropriation. Still, this profound misuse of federal funds continues. As such, the final rule or an additional regulation must make clear that Section 32 prohibits the diversion of Medicaid payments to unions and their affiliates, and that only assignments to government agencies or by court orders are permitted.
- The CA AG's Office indicates that the proposed rule would exceed HHS's authority under the Medicaid Act and intrudes upon state sovereignty.
- The CA AG's Office also indicated that intrusion in state labor laws raises Federalism concerns and violates the Tenth Amendment.
- The PA Dept. of the Auditor General questioned the validity of the \$8 million referenced in the footnote of the NPRM.

Major Decision Points/ Next Steps:

N/A

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Fan, Kristin A. \(CMS/CMCS\)](#); [Nardone, Michael P. \(CMS/CMCS\)](#); [Deboy, Alissa M. \(CMS/CMCS\)](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: PRR Comments - NASUAD Letter
Date: Wednesday, September 5, 2018 4:08:00 PM
Attachments: [NASUAD Letter - CMS 2413-P - Provider Reimbursement Reassignment.pdf](#)

Hi Mike, Alissa and Kristin,

Attached is the letter we received from NASUAD.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, September 5, 2018 10:14 AM
To: Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: PRR Comments - NASUAD Letter ***Draft Preamble Language ***

Hey Kenya,

We don't need a quick turnaround on the response. A response by COB 9/14/18 would be perfect!

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Cantwell, Kenya J. (CMS/CMCS)
Sent: Wednesday, September 5, 2018 9:41 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <jocelyn.ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: PRR Comments - NASUAD Letter ***Draft Preamble Language ***

How quickly do you need a response from us? I would like to discuss this at our DBC/DLTSS meeting, but we do not meet again until next Wed.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, September 4, 2018 5:12 PM
To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <jocelyn.ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: PRR Comments - NASUAD Letter ***Draft Preamble Language ***

Thank you all for responding. In thinking about the language that will go into the preamble of the final rule, I am thinking it should read similar to the following:

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Harris, Melissa L. (CMS/CMCS)
Sent: Thursday, August 30, 2018 2:20 PM
To: Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: PRR Comments - NASUAD Letter

(b)(5)

Melissa Harris
Senior Policy Advisor
Disabled and Elderly Health Programs Group
Center for Medicaid and CHIP Services
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Mail Stop S2-14-26
Baltimore, MD 21244
(p) 410-786-3397
melissa.harris@cms.hhs.gov



Please consider the environment before printing this e-mail.

From: Cantwell, Kenya J. (CMS/CMCS)
Sent: Thursday, August 30, 2018 8:48 AM
To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: PRR Comments - NASUAD Letter

(b)(5)

I am also interested in Kathy's thoughts on this.

From: Harris, Melissa L. (CMS/CMCS)

Sent: Wednesday, August 29, 2018 3:20 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <jocelyn.ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: Re: PRR Comments - NASUAD Letter

(b)(5)

Sent from my iPhone

On Aug 29, 2018, at 1:35 PM, Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov> wrote:

Hi Melissa, Kathy and Kenya,

(b)(5)

Thank you,

Chris Thompson

Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Ihrig, Jocelyn B. (CMS/CMCS)
Sent: Wednesday, August 29, 2018 11:07 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: PRR Comments - NASUAD Letter

Hey Chris,

I found one letter so far from [NASUAD](#). I think that's the entity that was mentioned during clearance.

Thanks,
Jocelyn

<NASUAD Letter - CMS 2413-P - Provider Reimbursement Reassignment.pdf>



1201 15th Street NW
Suite 350
Washington, DC 20005
Phone 202-898-2578
Fax 202-898-2583
www.nasuad.org

August 13, 2018

Seema Verma, Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-2413-P
P.O. Box 8016
Baltimore, MD 21244-8016

Re: CMS-2413-P

Dear Administrator Verma:

On behalf of the National Association of States United for Aging and Disabilities (NASUAD), I am submitting comments on the recently proposed regulation entitled Reassignment of Medicaid Provider Claims (CMS-2413-P). NASUAD represents the 56 officially designated state and territorial agencies on aging and disabilities. Each of our members oversees the implementation of the Older Americans Act (OAA), and many also serve as the operating agency in their state for Medicaid waivers and managed long-term services and supports programs that serve older adults and individuals with disabilities. Together with our members, we work to design, improve, and sustain state systems delivering home and community-based services (HCBS) and supports for people who are older or have a disability and for their caregivers.

As you know, the proposed rule would remove regulatory language promulgated in 2014 that added exceptions to the prohibition on reassignment of provider claims. Specifically, the 2014 regulation allowed for payment to a third party, “for benefits such as health insurance, skills training and other benefits customary for employees.”¹ Based on this provision, states have the option to establish payment arrangements with third party entities to assist with group purchasing of insurance, to help with skills training and other professional tasks.

We are concerned that removal of this provision may limit the ability of states to assist with ensuring cost-effective health insurance coverage for service providers or to establish training protocols that improve the quality of HCBS. This would be disruptive to a number of states who have leveraged this provision in efforts to address worker shortages by expanding benefits that can help recruit and retain providers in their HCBS systems. We specifically note that the 2014 regulation established an option that states can elect to implement and is not a requirement. Therefore, we recommend that this provision be retained as a state option and not as a mandate.

¹ 42 CFR §447.10(g)(4)

We also are concerned that the regulation may inadvertently limit the ability of states to ensure that there are appropriate supports for individuals who self-direct their long-term services and supports (LTSS). In many LTSS programs, participants have employer authority, which provides the right to hire and fire staff, set hours, and train the individuals providing care. In a number of cases, individuals can also direct how the money in their LTSS budget is spent through a process known as budget authority. In order to support individuals perform the tasks associated with self-direction, states routinely establish fiscal intermediary services, which can be financed in a number of different ways including through deductions from the participant budgets and provider payments. We recognize that the preamble of the regulation specifically addresses issues of self-direction and that CMS does not intend to limit the ability of participants to exercise employer and budget authority. If CMS does finalize this change, we recommend including language that specifically allows for the option to deduct finance costs associated with self-directed care, including fiscal intermediary services, payroll taxes, and other necessary expenses.

We appreciate the opportunity to comment on this regulation and would be happy to discuss our concerns in more detail. Please feel free to contact Damon Terzaghi of my staff at dterzaghi@nasuad.org with any questions about these comments.

Sincerely,



Martha A. Roherty
Executive Director
NASUAD

From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: PRR Comments and Responses - Final AM 10-17-18.docx
Date: Wednesday, October 17, 2018 10:14:27 AM
Attachments: [PRR Comments and Responses - Final AM 10-17-18.docx](#)

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From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: PRR Document
Date: Thursday, July 26, 2018 3:41:30 PM
Attachments: [CMS-2018-0090 - example.xlsx](#)

Attached.

July 25, 2018	Posted	July 25, 2018	CMS-2018-0090-1599	CMS-2018-0090-DRAFT-1608
July 13, 2018	DoNotPost		CMS-2018-0090-DRAFT-0008	CMS_FRDOC_0001-DRAFT-11150
July 12, 2018	DoNotPost		CMS-2018-0090-DRAFT-0018	CMS_FRDOC_0001-DRAFT-11141
July 13, 2018	DoNotPost		CMS-2018-0090-DRAFT-0020	CMS_FRDOC_0001-DRAFT-11152
July 14, 2018	DoNotPost		CMS-2018-0090-DRAFT-0022	CMS_FRDOC_0001-DRAFT-11156
July 15, 2018	DoNotPost		CMS-2018-0090-DRAFT-0023	CMS_FRDOC_0001-DRAFT-11157
July 16, 2018	DoNotPost		CMS-2018-0090-DRAFT-0034	CMS-2018-0090-DRAFT-0034
July 16, 2018	DoNotPost		CMS-2018-0090-DRAFT-0273	CMS-2018-0090-DRAFT-0273
July 16, 2018	DoNotPost		CMS-2018-0090-DRAFT-0332	CMS-2018-0090-DRAFT-0332
July 17, 2018	DoNotPost		CMS-2018-0090-DRAFT-0627	CMS-2018-0090-DRAFT-0627
July 22, 2018	DoNotPost		CMS-2018-0090-DRAFT-1522	CMS-2018-0090-DRAFT-1522
July 25, 2018	Draft		CMS-2018-0090-DRAFT-1609	CMS-2018-0090-DRAFT-1609
July 25, 2018	Draft		CMS-2018-0090-DRAFT-1610	CMS-2018-0090-DRAFT-1610
July 25, 2018	Draft		CMS-2018-0090-DRAFT-1611	CMS-2018-0090-DRAFT-1611

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Organization Name	Email
NFIB (Nat'l Fed'n of Independent Business)	david.addington@nfib.org
NFIB (Nat'l Fed'n of Independent Business)	david.addington@nfib.org
Congress of California Seniors	GaryP@seniors.org
UCLA	(b)(5)
UCLA	
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National Employment Law Project	cconnolly@nelp.org
National Employment Law Project	cconnolly@nelp.org
National Employment Law Project	cconnolly@nelp.org
NA	Roger.Klein@aya.yale.edu
NA	Roger.Klein@aya.yale.edu
NA	Roger.Klein@aya.yale.edu
NA	Roger.Klein@aya.yale.edu
NA	Roger.Klein@aya.yale.edu
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NFIB (Nat'l Fed'n of Independent Business)

david.addington@nfib.org

Colegio de Medicos de Puerto Rico

secretaria@colegiomedicopr.org

NA

NA

NA

Myself

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Consolidated Radiology Complex, CSP

vtorres@consolidatedradiology.com

SIGNET PUERTO RICO, LLP

nsouffront@sanjuanmri.net

NA

NA

Colegio de Mdicos Cirujanos de Puerto Rico

NA

NA

Oficina Dra. Carmen D Irizarry

NA

Dr Jose Badillo Hernandez Office, Hostos Medical service

NA

Not Applicable

Freedom Works

Not Applicable

Not Applicable

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General Comment

NFIB.1201 F Street NW Suite 200 Washington DC 20004 July 13 2018 The Honorable Alex M. Azar II Secretary of Health and Human Services
2 class of practitioners for which the Medicaid program is the primary source of service revenue payment may be
The Congress of California Seniors a nonprofit advocacy organization urges the Centers for Medicare and Medicaid Services to
Without a robust wage increase home care workers could leave for less demanding lowpaying jobs further harming the home care industry
The Nature of Home Care Work Short Schedules Uncompensated Hours Home care workers taking our survey were not receiving adequate
public assistance. The difference in weighted average wages between unionized and nonunionized workers was 21 percent.
hours of continuing education. It has made a big difference in the quality of care our clients receive. TJ Washington
Value of Training Unlike Medicare-funded home health aides¹⁴ there are no federal training requirements for home care workers.
In comparing the responses of unionized versus nonunionized workers we focused on the survey topics that are most relevant to
The work is hard and physically and mentally straining but it's rewarding. I like the people the most and I like feeling like I'm making a difference.
Moreover only 18 percent of those taking the second half of the survey said that their employer paid for on-the-job training.
Appendix B Survey Sample The respondents to our survey came relatively evenly from the Midwest South and West.
12 National Employment Law Project (NELP) Giving Caregivers a Raise The Impact of a 15 Wage Floor in the Home Care Industry
Appendix A Methodology Over the course of approximately two months at the end of 2016 and the start of 2017 thousands of home care workers
I'm always feeling economically insecure. Living in a place like New York with the cost of living it's hard. But at least I have my job.
Appendix C Table 1 Percentage Point Difference Between Unionized and Nonunionized Workers by Survey Topic
Surveying the Home Care Workforce Their Challenges The Positive Impact of Unionization
The closing months of the survey saw a surge in responses from workers in the Midwest South and West.
The age range of respondents approximately mirrored the national spread (Figure 11). The vast majority (81 percent) were aged 45 and older.
Faith in Public Life Hand in Hand The Domestic Employers Network HCAN Indivisible Illinois Interfaith Worker Justice
insufficient to allow adequate engagement by the variety of stakeholders providers HCBS consumers state Medicaid agencies
July 24 2018 The Honorable Alex M. Azar II Secretary U.S. Department of Health and Human Services 200 Independence Avenue S.W.
III. Conclusion HHS and CMS proposed rule removes the unauthorized exception to Medicaid's direct payment requirement that
rights required or pressured them to attend coercive union-led meetings and have impeded their ability to resign or otherwise
purposes of collective bargaining. Workers are denied all other benefits of employment such as access to state retirement plans
III. THE MEDICAID DIRECT PAYMENT EXCEPTION CONTAINED IN 42 CFR 447.10(g)(4) HAS BEEN USED TO JUSTIFY THE REGULATION
The regulation at 447.10 largely tracks the Medicaid statute. However it contains an additional exception that was not in the statute.
July 23 2018 Roger D. Klein JD MD Federalist Society Regulatory Transparency Project 27500 Cedar Road 808 Beach Blvd. Suite 200
appears to have created an opportunity for substantial abuse disadvantaging in-home health care providers and Medicaid beneficiaries.
1040 U.S. Individual Income Tax Return Department of the Treasury Internal Revenue Service (99) 2017 OMB No. 1545-0047
Hi Logan We just want to thank you for using TurboTax this year! It's our goal to make your taxes easy and accurate. We hope you find this helpful.
Electronic Filing Instructions for your 2017 Federal Tax Return Important Your taxes are not finished until all required information is entered.
Primary SSN (b)(6) R20000 Spouses SSN (b)(6) Signature GN HERE Page AR2 (R 8162017) REV 121217 TTO
2017 AR1000 FARKANSAS INDIVIDUAL INCOME TAX RETURN CHECK BOX IF AR1 Full Year Resident Jan. 1 - Dec. 31 2017
File by Mail Instructions for your 2017 Arkansas Amended Tax Return Important Your taxes are not finished until all required information is entered.
Logan B King (b)(6) Rev. 022015 Civista Bank Tax Product Privacy Policy FACTS What does Civista Bank do with your information?
Page 4 Arbitration Provision. This arbitration provision is made pursuant to a transaction involving interstate commerce.
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Logan B King (b)(6) age 2 sbia1514.SCR 103117
Logan B King (b)(6) The Deposit Account does not have sufficient funds to pay the TurboTax Fees and the fees for processing your return.
CUSTOMER SERVICE 8779087228 Santa Barbara Tax Products Group LLC and Civista Bank Refund Processing Agreement
Read and accept this Disclosure Consent This is an IRS requirement In order to finalize your request for this payment option you must
We need your consent to process with this payment option This is an IRS requirement The purpose of this agreement is to ensure that you
Logan B King (b)(6) Additional information from your Form AR1000F Individual Income Tax Return Form AR1000F
WHAT TYPE OF FILING METHOD WHAT ARE YOUR DISBURSEMENT OPTIONS WHAT IS THE ESTIMATED TIME TO RECEIVE YOUR REFUND
IMPORTANT DISCLOSURES If you are owed a federal tax refund you have a right to choose how you will receive the refund.
FCAUTION You cannot take this credit if either of the following applies. The amount on Form 1040 line 38 Form 1040 line 38

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The Ethan Allen Institute welcomes the proposed rule. In Vermont, the legislature (Act 48 of 2013) authorized a "f
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The government must eliminate states ability to divert part of Medicaid payments from providers to third parties
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I support home care workers and their choice to be union members. Home care unions not only advocate for fair
I strongly support the proposed regulatory change. No money should be skimmed from a Medicaid payment befo
July 24, 2018
The Honorable Alex M. Azar II
Secretary,
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Please find attached the Comments of ROGER D. KLEIN, JD, MD from the FEDERALIST SOCIETY'S REGULATORY TRA
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test@test.com
14 Cornel Drive
Goldens Bridge, NY
I support the removal of the text that allows a state to make payments to third parties on behalf of an individual p
I am trying to help my (b)(6) Medicaid is being cancelled as of July 31st...and our dilemma
Joe Wilson,
this is only a test

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test@test.com
14 Cornel Drive
Goldens Bridge, NY
I need a loan I glcan pay payments on and all my benefits

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I am writing in to tell you ppl I care less I agree taking my hard w
Department of Health and Human Services,
Yes stop this union from robbing me of my hard working money
Central City Concern. Portland Oregon patient have had 3 appointments. Diabetic crisis 3days still refusing to pres
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As a practicing physician and surgeon in Puerto Rico I thank CMS for recognizing the gravity of the issue at hand. I
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Health and Human Services The Honorable Seema Verma Administrator Centers for Medicare Medicaid Services
made to a third party on behalf of the individual practitioner for benefits such as health insurance skills training
and Services (CMS) to extend the 30 day comment period on its proposed changes in language added by CMS in 20
ing the supply of workers. Way back when I started I was getting paid 3.90 an hour. That was before there was a u
e asked how many hours they had clocked the previous week (Figure 1) and they revealed that this is largely a pa
an hour more for unionized workers. The benefits home care workers gain can also impact consumers. Home ca
on Home Care Worker Independent Contractor Misclassification Personal care and home care services are seldom
e care workers.15 And at the state level training requirements for home care workers are minimal or nonexistent
most influenced by home care unions. For example unions have little to no means of influencing how many hours
ing like Im needed and appreciated We are providing a vital service. Lynda Illinois Home Care Worker
o transportation costs such as reimbursement for public transportation mileage or gas. Fiftytwo percent of work
tern regions of the country with a smaller sample from the Northeast (Figure 9). Because ours was a selfselectin
: Care Industry February 2015 citing University of California Berkeley Labor Center calculations of federal data. ht
he National Employment Law Project and the Service Employees International Union partnered to solicit the par
: I have the union. Before the union I didnt have any benefits. And if a client stopped getting services you could b
nd Subgroup24 Responses All IP Only Agency Only Publicly Funded Only Privately Funded Only Do you expect to still
2016 we asked home care workers (i.e. caregivers who provide non medical inhome assistance with daily living
ent) of our sample is in her prime earning years between 35 and 64.20 The Bureau of Labor Statistics predicts the
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id programs etc. affected by the rule. Moreover we note that at several points in the proposed rule CMS solicits
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requirement that these agencies created in 2014. Eliminating 447g)(4) wil I return the pertinent HHS regulations to
union membership. In addition organized labor has used state resources to promote membership and signed up
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HE DIVERSION OF MILLIONS OF DOLLARS IN MEDICAID FUNDS TO UNIONS. Although legal considerations must g
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wood OH 44122 roger.kleinaya.yale.edu Centers for Medicare Medicaid Services Department of Health and Hun
Medicaid beneficiaries while providing few if any tangible benefits to these individuals or the Medicaid program.7
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ntage programs make there own new rules of how much they are going to pay us. They also put many limits in th

ens deserve better. We deserve the same benefits as our fellow Americans. Physicians are leaving the country ex
or this purpose, so the insurance companies can not utilize the money at their convenience. If we are already unc
ge q nos roban nuestros beneficios e incluso a los pacientes gracia por justicia contra los planes advantage
dvantage por los pasados 20 aos y estamos experiementando una posicion de obligarnos a firmar un contrato c
ents diverted to third parties outside of a few very specific exceptions. CMS needs to ensure that providers rece

bursement for services done to patients. Better rates mean our patients get the best service they need.

The providers should receive
payment, otherwise Meficaid money is going to
end in hands that will not
ido, estamos cansados de cumplir con todos los requisitos q nos exigen sin recibir nada a cambio, el 80% se lo l
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health insurance companies that manipulate the doctors, reimbursement and the patients. There is
atient i know CMS make contract with private insure company but the main goal fo this budget (public money) i

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= and diverting the money to unions reducing resources for those in need! END Dues Skimming!

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osition to proposal # CMS-2413-P, because it is not only an overstep but an underhanded attack on home care in
is not only an overstep but an underhanded attack on home care in this country.

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provider for benefits such as health insurance, skills training, and other benefits customary for employees. Third
a is...they want to put (b)(6) on sharecare...which would taken (b)(6) Medications to \$750 a month... .which is i
ew York 10526</p>

is not only an overstep but an underhanded attack on home care in this country.

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orking money out my pay check is wrong these ppl that call theme self a union in my opinion is just wrong I have
I live pay check to pay check and in August 2018 ihss is taking hours from me who going to fight for me it only 4
cribe meds. Supposed to be worked in yesterday. Only one NOT HELPED! Told me to find Urgent Care. 3rd day b

am one of the currently scarce sub-specialists on the island that, as you are aware, has the highest rate of diabe
reach of CMS authority designed only to attack home care workers and their freedom to spend their wages as t
reach of CMS authority designed only to attack home care workers and their freedom to spend their wages as t

Department of Health and Human Services Attention CMS2413PP.O. Box 8016Baltimore MD 212448016 Dear M and other benefits customary for employees.An agency such as HHS has no power to act unless Congress confer 14 clarifying that deductions from independent home care providers pay for benefits customary for employees a union. At the time I knew nothing about unions. I wasnt a fighter then. When I stopped working I was making 13.1 parttime workforce. Sixtyone percent of respondents work less than fulltime (less than 40 hours per week).4 Most re workers with health insurance (61 percent of unionized versus 28 percent of nonunionized respondents) and i performed by individuals running their own separate independent businesses but home care agencies frequent it in the vast majority of states.16Many of our respondents want to continue developing skills in order to improv ; workers get whether they have a consistent schedule or how workers are classified for tax purposes. A breakdc

ers reported having more than one consumer in their care. These responses indicate that some workers may be ig group responding to a social media and computerbased survey any disparities could reflect differences in inter ttpwww.nelp.orgcontentuploads201503GivingCaregiversA Raise.pdf13 Legally workers are entitled to a premium ticipation of home care workers in a nationwide online survey. We used targeted ads on social media and direct ie out of work for a month. With the union we get reassigned fairly quickly. Lisa New York Home Care WorkerTh be employed as a home care worker a year from now YES6104612Are you currently trying to find a job in addit tasks such as mobility eating dressingtoileting and bathing) to participate in an online survey about their jobs and at between 2014 and 2024 we will need an additional 458100 personal care aides.21 Thus it is critical that there e Missouri Jobs with Justice NAACP NARAL ProChoice Missouri NARAL ProChoice North CarolinaNational Asian Pa comment on a fairly wide variety of issues. In particular CMS notes that the rule could be economically significant making RIN 0938AT61 Medicaid Program Reassignment of Medicaid Provider ClaimsDear Secretary AzarAs org their permissible statutory scope. In so doing HHS will curb Medicaid abuse increase the takehome pay of inhom workers electronically via handsigned cards or by telephone while instituting highly stringent conditions for resig y in the event of lawsuits but unions become their exclusive representatives. States serve as organized labors du overn HHS decision to remove the exception to Medicaid's direct payment rule contained in 42 C.F.R. 447.10(g)(se providers Medicaid plans may pay funds owed for services rendered to third parties for benefits such as health nan Services Attention CMS2413PP.O. Box 8016Baltimore MD 212448016 Re File code CM S2413PComments su THE HHS SECRETARY LACKS THE AUTHORITY TO CREATE NEW EXCEPTIONS TO MEDICAIDS DIRECT PAYMENT PRO ing 2017 ending 20See separate instructions.Your first name and initialLogan BLast nameKingYour social security so easyWell have all your information saved and ready to transfer in to your new return. Well ask you questions n 1040) shows a refund due to you in the Dueamount of 1823.00. Applicable fees were deducted from your orig

amended tax return shows you are due a refund ofDue936.00.Refund What YouYour amended tax return Form ives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect ny way arise out of or relate to this Agreement shall be resolved solely by binding arbitration before the Americ ty to act on your request. You may notify us in writing at Civista Bank co Santa Barbara Tax Products Group LLC 1

to automatically deduct such fees (or any portion thereof) via ACH electronic check or wire transfer directly from onditions and disclosures about the processing of your refund (the Refund Processing Service) by Santa Barbara a Tax Products Group LLC (SBTPG) the administrator and servicer of this payment option your identifying inform x software to verify that your refund is enough to cover total fees and applicable sales tax.IRS regulations requir

rocessing ServiceIRS direct deposit to your personal bank account.Approximately 6 to 8 weeks 2No additional co e read about these options below.You can file your tax return electronically or by paper and obtain your refundd ily).The person(s) who made the qualified contribution or elective deferral (a) was born after January 1 2000 (b)

re services / medications covered by the insurance affecting the treatment and health of the patient.
It is wi

Exponentially while medical insurance companies are just looking for their best interests harming doctors compen-
sated just imagine what will happen if the medical insurance companies have the right to control what belongs

on tarifas del 2016 y la resistencia de las aseguradoras locales de pasarle a los proveedores el aumento de Medi
ive their complete payment, and any circumstances in which a state does divert part of a providers payment mu

take care of so many
persons. There is a big difference between what
looks nice on paper and reality c
levan las aseguradoras, es una gran noticia, abog por q se haga justicia, gracias.

also a severe shortage of
specialist. The main reason for the shortage is the difficult working conditions. A
it to provide excellent care to patient and also decent payment to providers. that company need more restrictio

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The proposed rule interferes with working people's freedom to join together in a union to bargain for wa
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old and health insurance is my biggest concern. Without the union group health insurance my family will not be
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institutions, thereby saving the government money. Remember, someday you might be on the receiving end of
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ons for public workers, who were already represented! We were warned!
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they choose. By not allowing members to pay union dues or health insurance automatically from their paychecks

parties are frequently using such money for their operational costs and the providers are being poorly compensated. It is impossible.. (b)(6) oncologist, zapped some of tumors in his liver...for now....he has had cancer off and on, in liv

home care workers and their choice to be union members. Home care unions not only advocate for fair wages and benefits, but also no idea why I joined these union I feel they don't do anything for me but they say we got you raise I say 11.50 really 11.30 hours out of 106.3 top it off I don't know how to use that .3 so I never claim it I try call these bull shit union no one cares about my blood sugar 350. Still will not prescribe medication told to wait for my appointment tomorrow. When am I going to

test morbidity and mortality per capita in the USA. As a practicing physician, I can attest that the massive exodus of doctors from the country is a direct result of the way the system is run. They choose. By not allowing members to pay union dues or health insurance automatically from their paychecks. They choose. By not allowing members to pay union dues or health insurance automatically from their paychecks.

1r. SecretaryREComments in Response to Department of Health and Human Services Notice of Proposed Rulema
s that power on the agency Louisiana Public Service Commission (PSC) v. Federal Communications Commission (FCC) are permissible. The target of this proposed change is clearly a class of practitioners for whom Medicaid is the pri
85 an hour. When we unionized we fought for paid training paid time off benefits health insurance and life insur
t said they would work longer if they could 81 percent said that they sometimes or always wanted to work more
paid time off (55 percent of unionized versus 23 percent of non unionized respondents said they receive either
ly mislabel their employees independent contractors and deny them basic workplace protections and benefits. (C
ve the care of their consumers. A full 82 percent indicated that they thought consumers would benefit if workers
own of the differences in percentage points between the two samples across each pertinent topic can be found i

spending part of their day and their own resources getting from one consumer to the next. I've worked with a 97
net access in employment situations or personal inclination. Nevertheless we believe that these survey results a
n payment of one and a half of the regular rate of pay when they work overtime hours for the same employer. I
email solicitation to get a wide sample of both unionized and nonunionized workers. As part of our outreach to
those who completed the second detailed half of the survey shared information about employer provided benefit
tion to or other than being a home care worker YES (6)(8)(4)(9)(8) Do you think you would benefit from additiona
d their lives. 1 More than 3000 workers located in 47 states and the District of Columbia responded to a short su
be a replacement workforce ready to offset turnover from the field and address the additional demand. As PHI
acific American Womens Forum (NAPAWF) National Association of Councils on Developmental Disabilities Nation
it but acknowledges that it does not currently have the data to complete a full analysis that is required for such
organizations representing a variety of stakeholders with an interest in and concern about Medicaid policy we writ
ie health care providers protect the rights of caregivers and Medicaid beneficiaries and defend taxpayers and the
nation. (Maxford Nelsen Six Ways SEIU 775 Is Getting Around Harris v. Quinn Freedom Foundat ion May 18 201
ues collectors automatically deducting the funds from workers Medicaid payments on the unions behalf. Transfe
4) there is also a strong policy reason for eliminating it. Medicaid spends approximately 170 billion per year on li
th insurance skills training and other benefits customary for employees. Irrespective of the possible merits of suc
bmitted electronically at www.regulations.gov Dear Secretary Azar and Administrator Verma Thank you for the c
HIBITION. Section 1902(a)(32) of the Social Security Act codified as 42 U.S.C. 1396a(a)(32) mandates that state IV
r number (b)(6) f a joint return spouses first name and initial Last name Spouses social security number Home
s about what changed since we last talked and well be ready to get you the credits and deductions you deserve r
ginal Refund refund amount of 1823.00. Your refund is now 1706.03. Because you chose to have your TurboTax fe

AR1000F. Remember to sign and date Need to the return. Mail Staple the state copy of each of your W2(s) and 1
share and protect your personal information. Please read this notice carefully to understand what we do. Why TI
an Arbitration Association (AAA) before a single arbitrator in arbitration commenced as close as possible to wh
11085 North Torrey Pines Road Suite 210 La Jolla California 92037. FEDERAL ELECTRONIC FUND TRANSFER ACT D

m the account into which you authorized Bank to deposit your Expected Proceeds as set forth in Section 7 and (t
Tax Products Group LLC (Processor) a third party processor using banking services of Civista Bank (Bank). Read t
ation your deposit information and your refund amount. We transmit this information so that you may use this p
e the following statements Federal law requires this consent form be provided to you. Unless authorized by law

st. Check mailed by IRS to address on tax return. Approximately 6 to 8 weeks 2 ELECTRONIC FILING (EFILE) No Refu
directly from Internal Revenue Service (IRS) for free. If you file your tax return electronically you can receive a r
is claimed as a dependent on someone elses 2017 tax return or (c) was a student (see instructions). Traditional a

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working titled Medicaid Program Reassignment of Medicaid Provider Claims CMS2413P 83 Fed. Reg. 32252 (July 12, 1986). As HHS acknowledges in the Notice no statute confers upon HHS the power to create a primary source of income such as home care providers. In 2014 CMS adopted regulatory changes that allowed pay for home care services. Lynda Illinois Home Care Worker Virtually all who took our survey said that they worry about their economic future (Figure 2). Almost one third work a second job other than home care and 53 percent are currently seeking a job (Figure 2). Those who are currently seeking a job (Figure 2) can better tend to their own health needs and take off time while a respite or backup caregiver is needed. Correct classification of workers as employees is key to securing their legal protections and ensuring fair compensation and ongoing training. Many indicated interests in specific skill sets (Figure 7) among the most popular topics in Table 1 in Appendix C. In addition to comparing unionized versus nonunionized workers overall we analyzed the

year-old woman for the past two years. I try to treat her with so much tender loving care and she always reminds me of my mother. These workers are broadly representative of national trends. Congruent with national trends far more of our respondents work in home care structures can aid in people working more than 40 hours in a week without overtime pay. 14 42 CFR 4.1000 nonunion workers respondents were given the opportunity to enter a raffle for a gift card if they completed the survey with us and the results are not heartening. These workers who care for older adults people with disabilities and children need training on providing home care. YES 433(1) 4 When you work more than 40 hours in a week are you paid for the extra hours? 2600 of them went on to complete a second more detailed section. These responses reveal an experienced caregiver who has noted a quickly growing population of elderly consumers coupled with a small projected increase in the number of workers. National Employment Law Project (NELP) National Health Law Program National LGBTQ Task Force National Womens Institute for Policy Studies and solicits information from the public that would allow it to do so. It is difficult to see how a 30-day comment period can be used to respectfully request that the Department of Health and Human Services (HHS) extend the public comment period to ensure the integrity of the Medicaid program. Respectfully Yours Roger D. Klein

6 <https://www.freedomfoundation.com/laborsixwaysseiu775isgettingaroundharrisvquinn> (last visited July 23, 2017). The transfer of Medicaid dollars to unions preceded implementation of 447.10(g)(4). Some states have deducted as much as 10 percent of long term services and supports (LTSS) nearly 60 percent of which is for home and community based services (HCBS). Although an exception Congress did not include it in the law and delegated no authority to the HHS Secretary to create a rule. Opportunity to submit comments on the Department of Health and Human Services (HHS) and Centers for Medicare and Medicaid plans provide that no payment under the plan for any care or service provided to an individual shall be made if the individual does not have a permanent address (number and street). If you have a P.O. box see instructions. 220 Palomino RD Apt. no. c Make sure the service is for you no matter what life throws at you. Heres the final wrap up for your 2017 taxes Your federal refund is 1823.00 You have 100.00 taxes deducted from your refund you will receive email from Civista Bank which handles this transaction. Your tax re

099R(s) to the front of the return. Mail your return and attachments to Arkansas State Income Tax Amended Tax Credit. The types of personal information that we collect and share depend on the product or service you have with us. There are no charges for you to reside. Any and all disputes must be brought in the parties individual capacity and not as a plaintiff. DISCLOSURES In case of errors or questions about electronic transfers to or from the Deposit Account write to Sa

c) if you made alternative arrangements with TurboTax for payment of such fees those arrangements will be attached to your return. Please read this Agreement carefully before accepting its terms and conditions and print a copy and/or retain this information for your records. Payment option. BANK and SBTPG will use your information in accordance with their applicable refund processing policies. We cannot use your tax return information for purposes other than the preparation and filing of your tax return.

and Processing Service IRS direct deposit to your personal bank account. Usually within 21 days 2 No additional cost for a refund check directly from the IRS through the U.S. Postal Service in 21 to 28 days from the time you file your tax return. Do not include Roth IRA (including myRA) contributions for 2017. Do not include rollover contributions

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and service agreements providing the patient with the quality of care they are entitled to. Funds not regulated by

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ot of stress, too many nights on call, very little free time. I can deal with all that as long as I can pay my bills. When I was in the military, I was paid to go to work. I was paid to be there. I was paid to be on call. I was paid to be on the most expensive health system in the world. that money to the patient manage and providers professionals

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1. **Workers' Freedom to Join a Union:** The bill guarantees workers the right to join a union without fear of retaliation. It prohibits employers from firing, disciplining, or otherwise punishing workers for their union membership or activities. If adopted, this provision will strengthen the National Labor Relations Act (NLRA) and ensure that workers can exercise their fundamental rights without interference from employers.

2. **Protection Against Unfair Labor Practices:** The bill outlines specific actions that employers are prohibited from taking, such as refusing to bargain in good faith with the union or discriminating against workers based on their union affiliation. These provisions are designed to prevent employers from engaging in tactics that undermine the collective bargaining process.

3. **Strengthening the National Labor Relations Board (NLRB):** The bill provides for the reauthorization and strengthening of the NLRB, the federal agency responsible for enforcing labor laws. It ensures that the Board has the necessary resources and authority to investigate and resolve disputes between workers and employers effectively.

4. **Enhancing Worker Protections:** The bill includes provisions that protect workers from retaliation if they file a complaint or participate in an investigation. It also addresses issues related to the representation of workers in the workplace, ensuring that unions can represent their members' interests properly.

5. **Transparency and Accountability:** The bill mandates greater transparency from employers regarding their labor practices. It requires employers to provide certain information to the NLRB and workers, ensuring that the process is fair and accountable.

6. **Support for Union Representation:** The bill supports the role of unions in the workplace by providing legal backing for their activities. It ensures that unions can negotiate contracts, represent workers in disputes, and engage in collective bargaining without undue restrictions.

7. **Addressing Retaliation and Discrimination:** The bill provides clear guidelines and remedies for workers who experience retaliation or discrimination. It ensures that affected workers can seek legal recourse and that employers are held accountable for their actions.

8. **Ensuring Fair Labor Practices:** The bill reinforces the principles of fair labor practices, including the right to a safe and healthy workplace. It ensures that workers' voices are heard in decisions that affect their working conditions.

9. **Support for Economic Stability:** By promoting fair labor practices and supporting unions, the bill aims to contribute to a more stable and equitable economy. Strong labor relations are essential for long-term economic growth and prosperity.

10. **Commitment to Worker Rights:** The bill reflects a commitment to the fundamental rights of workers and the importance of collective bargaining. It is a step towards creating a more just and balanced labor market.

11. **Ensuring a Fair and Equitable Labor Market:** The bill seeks to create a level playing field for all workers, regardless of their industry or occupation. It ensures that the rules of the labor market are fair and consistent.

12. **Support for the Middle Class:** By protecting workers' rights and supporting unions, the bill aims to support the middle class and ensure that workers receive a fair share of the economic gains.

13. **Transparency in Labor Relations:** The bill promotes transparency in the relationship between employers and workers, ensuring that all parties are informed and can make decisions based on accurate information.

14. **Strengthening the Rule of Law:** The bill reinforces the rule of law in the workplace, ensuring that all parties are held accountable to the same standards and regulations.

15. **Commitment to Social Justice:** The bill is a reflection of a commitment to social justice and the belief that all workers deserve the same rights and protections.

16. **Support for Economic Growth:** By fostering a healthy labor market and supporting unions, the bill aims to support overall economic growth and stability.

17. **Ensuring Worker Safety:** The bill includes provisions that ensure workers' safety in the workplace, addressing issues related to occupational health and safety.

18. **Support for Worker Education:** The bill supports efforts to improve worker education and training, ensuring that workers have the skills and knowledge needed to succeed in the modern workforce.

19. **Transparency in Decision-Making:** The bill promotes transparency in the decision-making process, ensuring that workers have a say in decisions that affect their lives.

20. **Commitment to a Fair Future:** The bill is a commitment to a fair and equitable future for all workers, ensuring that their rights and interests are protected for generations to come.

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that they essentially control. They write their own rules, change them according to their convenience and thus fail I hinders the unions ability to fight for home care. Home care unions not only advocate for fair wages and benefits I hinders the unions ability to fight for home care. Home care unions not only advocate for fair wages and benefits

2018) This letter presents comments of the National Federation of Independent Business (NFIB) in response to the State by regulation an exception to the statutory prohibition in section 1902(a)(32) of the Social Security Act. Comments to be made directly by states to labor unions representing home care workers. Now CMS is seeking to rescind the rule (Figure 4) and nearly 75 percent of those putting in 40 or more hours a week as a home care worker say they have another job in addition to or other than being a home care worker. This data gives us insight into our respondents' lives. They fill in for them without going to work sick. I like making people happy. A lot of my clients don't have family. Discrimination by law-abiding businesses. Misclassification complicates workers' relationship to their employers and comes at a cost. Cases were those that address preventative care including nutrition and meal prep (30 percent interest) and monitoring. The percentage point differences between the two samples within subgroups.¹⁸ We don't just fight for our wages and

but for the dignity of how much she loves me. She says that whenever she's feeling down I help to lift up her spirits. Home care workers at an agency rather than as independent providers (IPs) chosen directly by consumers: 70 percent said that they work for less than \$10 an hour.⁸⁴ <https://www.law.cornell.edu/cfr/text/42/484.3615> Paraprofessional Healthcare Institute (PHI) PHCAST Final Evaluation survey. Only those who indicated they were current home care workers were able to complete the survey. The survey found that those with illness do so for the most part without employer-provided healthcare (61 percent did not report receiving overtime at 1.5 times your regular hourly rate). NEVER (10)(18)(10)(12)(14) Employer offers health insurance 334 percent. A dedicated and committed workforce that puts in long hours caring for consumers but receives unsustainably low pay and a high number of women in the paid workforce means that pay and conditions for these workers will need to be such that they can survive. Law Center New Jersey Citizen Action North Carolina Justice Center POWER Progressive Caucus Action Fund Sargent and Lundy. The period will be sufficient to produce the information that is necessary to understand either the direct financial impact or the indirect impact of the above-referenced proposed rule by a minimum of 30 days to allow for meaningful stakeholder participation.

18)). What if any benefits these providers and their patients receive from the union expropriated dollars are unclear? It's \$1000 a year from independent in-home health workers' modest pay for years often without workers' knowledge (see CBS). (Steve Eiken et al. Medicaid Innovation Accelerator Program: Medicaid Expenditures for Long-Term Services and Supports). One need only look to the plain ordinary meaning of the language of the Social Security Act to conclude that the term "individual" includes Medicaid Services (CMS) proposed rule on the Medicaid Program Reassignment of Medicaid Provider Claim. The rule made to anyone other than such individual or the person or institution providing such care or service under an agreement. SSN(s) above and on line 6c are correct. City, town or post office, state and ZIP code. If you have a foreign address, please provide it. Accuracy Guarantee Breathe easy. The calculations on your return are backed with our 100 Accuracy Guarantee. Your refund will be direct deposited into your account. The account information you entered: Account Number 501869

Group P.O. Box 3628 Little Rock, AR 72203-3628 Don't forget correct postage on the envelope. What You Keep This can include Social Security number and account balances, payment history and transaction history, overdraft history, and more. If you are a class member in any purported class or representative proceeding, judgment on the award rendered by the court in the case of *Barbara Tax Products Group LLC*, 11085 North Torrey Pines Road, Suite 210, La Jolla, California 92037 or telephone (619) 499-1100.

Completed prior to any automatic deduction. Acknowledgements. (a) You understand that (i) neither Bank nor Provider will be electronically filing your return for future reference. As used in this Agreement, the words "you" and "your" refer to the applicant or the individual who is the subject of the service agreement and privacy policy. IRS regulations require the following statements: Federal law requires this information to be provided to you without your consent. You are not required to complete this form to engage our tax return preparation services.

Check mailed by IRS to address on tax return. Approximately 21 to 28 days. 2. ELECTRONIC FILING (EFILE) Refund Payment. The IRS can deposit your refund directly into your bank account in less than 21 days from the time you file your return. . . . Elective deferrals to a 401(k) or other qualified employer plan, voluntary employee contributions to a

best scale in many years. Many have promised to honored the new scale. We are still waitng.
Thank you.

When the financial stability was in jeopardy, I left the Island. I want to go back because I feel the people need me. I

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Health and Human Services (HHS) extend the public comment period for the above-referenced proposed rule (NPI
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This proposed rule affects pay

the Department of Health and Human Services (HHS or Department) Notice of Proposed Rulemaking titled Medically Necessary 42 CFR 447.10(g)(4) was void from its inception and HHS should revoke section 447.10(g)(4) as proposed. We find that interpretation claiming it violates the Social Security Acts requirement that Medicaid payments may only be made for services that are medically necessary is not supported by the text of the statute. We do not know how many home care workers missed last week and indeed most said that the number of hours they reported was typical. We do not know how many. They shouldn't feel alone when they are sick. I tend to go a little above and beyond and I treat them as my own. I am not with sometimes confusing implications for their income taxes contributions to safety net programs and workplace safety. Improving consumers health and wellness (27 percent). But most popular was training in specialized care for specific conditions. We fight for our clients. We so often put our clients needs in front of ours. It helps us in the long run. In the recesses

There is not just about going by the care plan it doesn't say comfort her or make her feel like she's a part of society. But for an agency (this includes workers who may also work as an independent provider). Only a very small number of respondents. Evaluation Underscores Urgency of Building out Comprehensive Competency-based Training for Direct Care Worker. Our survey consisted of two parts. The first was a series of 10 questions that covered topics concerning worker demographics (e.g., receiving health insurance) or paid sick days (only 19 percent get them). Less than half reported even getting employer benefits. 17292736Employer offers retirement fund814865Employer offers paid sick days111211721Employer offers paid sick days. A sizeable percentage of respondents are treated as independent contractors and may be misclassified. 11 they can attract workers.22 Respondents who filled out the more detailed portion of our survey brought a great deal of information. Shriver National Center on Poverty Law Service Employees International Union Tennessee Citizen Action. The impact or the broader effect of the proposal on the HCBS delivery system and especially on the consumer direct care workforce. Participation in the comment process and completion of a robust analysis of the economic impact of the proposal a

clear. Rather state officials have chosen to line the pockets of union allies at the expense of poor sick and disabled workers. Without their consent. In this way unions have colluded with friends in state governments to siphon an estimated 1.4 billion dollars in Medicaid and Supports in FY 2016 (2018). A substantial majority of HCBS dollars are intended to allow Medicaid recipients to receive services. The HHS Secretary lacks the authority to add new exceptions to Medicaid's direct payment rule. For example Merit-based Incentive Payment System. My comments represent my personal opinions and not those of the Federalist Society's Regulatory Transparency Project. Assignment or power of attorney or otherwise except that ... The statute sets forth exceptions for payment to entities. We also complete spaces below (see instructions). White Hall AR 71602 Presidential Election Campaign. Check here if you are a candidate. We double checked your return for errors along the way. We helped with step by step guidance to get your annual return. 290 Routing Transit Number 082902757. When Will The IRS issued more than 9 out of 10 refunds to taxpayers in

the instructions and a copy of your return for your records. Need to tell you did not print one before closing TurboTax. Tax story and account transactions. When you are no longer our customer we continue to share your information as required by law. The arbitrator may be entered in any court having jurisdiction over the dispute. Each party agrees to any such arbitration. (877) 9087228 and provide your name a description or explanation of the error and the dollar amount of the error.

The processor can guarantee the amount of your tax year 2017 federal tax refund or the date it will be issued and (ii) neither the applicant nor joint applicant if the 2017 federal income tax return is a joint return (individually and collectively). A consent form be provided to you. Unless authorized by law we cannot disclose your tax return information to third parties. If we obtain your signature on this form by conditioning our tax return preparation services on your consent you agree to the above.

Processing Service Direct deposit to your personal bank account or Load to your prepaid card 1. Usually within 21 days. We will file your tax return unless there are delays by the IRS. If you file a paper return through the U.S. Postal Service you will receive a copy of your return. Add 501(c)(18)(D) plan contributions for 2017 (see instructions)3 Add line

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If this rule were to go into effect, home care worker:
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ychecks for services rendered, not Medicaid payments, unfairly limiting how workers spend their own pay. Elimii

icaid Program Reassignment of Medicaid Provider Claims (Notice) and published in the Federal Register of July 1 d in the Notice. According to the Notice one potential impact of revocation of 42 CFR 447.10(g)(4) would be that nly be sent directly to providers. If this rescission is implemented home care workers would be required to make ust rely on a publicly funded program like Medicaid Supplemental Nutrition programs the Earned Income Tax Cre any work these hours only part of the year however. Other surveys have shown that nearly 67 percent of home become a member of the family. Lisa New York Home Care Worker Finally for several of the survey topics we fo ace protections. To truly understand the extent of misclassification in this industry and its effect on workers and diseases or disorders (43 percent) perhaps indicating the shifting nature of home care as baby boomers age and sion hours were cut and it caused confusion and anxiety amongst our clients. Every time someone takes service:

arbara New York Home Care Worker Low Wages Few Benefits In addition to the struggle to receive enough hours eported they got work through a private registry or online platform. Our survey respondents were almost entirel s July 2016 <https://www.phinational.org/blogs/phcast/final-evaluation-underscores-urgency-building-out-comprehensive-geographics-method-of-payment-hours-wages-and-some-qualitative-questions-about-workplace-satisfaction>. All wor yer provided safety equipment like gloves. Of respondents who were injured on the job 57 percent indicated the vacation days 3032282627 Employer offers transportation benefit 1824161816 Employer offers training opportun sified. These workers are overwhelmingly women of color many of whom are in their prime earning years. Despi deal of experience as home care workers to the project. Nearly 60 percent had more than six years on the job a Leadership Conference on Civil and Human Rights UDWA FSCME Local 3930 Virginia Organizing Working America d service model. We note further that CMS provides no indication of any urgency in promulgating this rule that v is well as its more general impact on Medicaid home and community based services (HCBS). The Notice of Propos

d Medicaid recipients and their working class caregivers. Closing a loophole that helps allow them to do so will se on from Medicaid including 150 million in 2017 alone. (Maxford Nelsen Getting Organized at Home Why Allowing nts to continue to live at home or in the community rather than in expensive restrictive nursing homes or other riam Websters online dictionary defines the term except as only often followed by that and with this exceptio cy Project or any other organization or entity with which I am affiliated. INTRODUCTION As an attorney physicia n employers health care facilities such as hospitals or clinics government agencies providers of billing or collection se you or your spouse if filing jointly want 3 to go to this fund. Checking a box below will not change your tax or ref swers on the right IRS forms. We made sure you didnt miss a deduction even if something in your life changed lil n less You Get than 21 days last year. The same results are expected in 2018. To Your get your estimated refund d

ix go back to the Keepprogram and select File tab then select the Print for Your Records category. 2017 Adjusted described in this notice. What All Financial Companies need to share customers personal information to run their ration shall bear its own separate costs and expenses of the arbitration and shall share equally in the charge e suspected error. We will determine whether an error occurred within 10 business days after we hear from you

either Bank nor Processor is affiliated with the transmitter of the tax return (Intuit) and neither warrants the acc ectively Applicant). The words we us and our refer to Bank and Processor. NOTICE No Requirement To Use the R hird parties for purposes other than the preparation and filing of your tax return without your consent. If you co ur consent will not be valid. Your consent is valid for the amount of time that you specify. If you do not specify tl

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2018. The Notice proposes to conform HHS regulations to section 1902(a)(32) of the Social Security Act by revising the rules that states stop reassigning homecare workers dues to unions. 83 Fed. Reg. 32254. Given the prohibition in section 1902(a)(32) that union payments themselves rather than having the payments automatically be forwarded. The Congress of California has passed a bill to make ends meet.12As we noted above many workers expressed a desire for more hours but extra hours are not always available. Home care workers work part time or get full time hours but for only part of the year.5 Three out of every 10 workers are women and no significant difference between unionized and nonunionized workers. For example the rates of workers reassigning their hours to customers would require a more detailed set of questions and conversations with workers however a few workers seek to remain at home with conditions that previously would have sent them to a nursing home. Education is a barrier to work as a way it causes anxiety. A lot of our clients got all of the hours back that were cut from them. There have been a

many workers and their families remain in poverty due to the low wages they are paid. Although home care industry is 95 percent female (95 percent) and more than 58 percent indicated that they are African American with only 29 percent indicating they are white.16 Paraprofessional Healthcare Institute (PHI) Personal Care Aide Training Requirements <http://www.phihq.org> workers had the option of also completing a second set of 12 survey questions concerning job tenure and prospects. 67 percent indicated that their employer did not provide health insurance and 78 percent indicated that they did not have a sick day benefit. 2036171814 Employer offers safety supplies such as gloves 206(4)7 Endnotes1 For more on how our survey validates the importance of the work they do they frequently have to supplement their home care work with other jobs and 37 percent reported more than a decade as a home care worker (Figure 12). This represents tenure on the job. Working America North Carolina Working Partnerships USA Workplace Justice Project at Loyola Law Clinic WV City would justify a truncated comment period. We thus ask that you extend the period for public comment by an additional 30 days. Rulemaking (NPRM CMS2413P) issued by the Center for Medicare Medicaid Services (CMS) would repeal a r

and a strong message to states and unions that they must adhere to the Supreme Courts rulings in Harris and Jarmon v. Alabama. 5 States to Siphon Medicaid Funds to Unions Harms Caregivers and Compromises Program Integrity (2018) Due to the long term care facilities. Since promulgation of the new exception to Medicaid's direct payment rule in 2014 some states have begun to do so. (Except. MerriamWebster.com. 2018. <https://www.merriamwebster.com> (20 July 2018).) Similarly Oxford Dictionary defines a siphon as a tube or pipe that draws liquid from one container to another. n and health policy expert with the Federalist Societys Regulatory Transparency Project I fully support your proposed rule pursuant to a court order and for physicians whose patients are seen by another physician under specific circumstances. YouSpouse Foreign country name Foreign province state county Foreign postal code Filing Status Check only or select one. Make a new job new house or more kids Also included We provide the Audit Support Center free of charge in the United States. Late from TurboTax log into My TurboTax at [Refundwww.turbotax.com](http://Refund.www.turbotax.com). If you do not receive your refund within

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accuracy of the software used to prepare the tax return. (b) You agree that Intuit is not acting as your agent and is not providing a refund processing service in order to file electronically. YOU UNDERSTAND THAT A REFUND PROCESSING FEE OF \$10.00 WILL BE CHARGED TO YOUR CARD UPON THE DISCLOSURE OF YOUR TAX RETURN INFORMATION. Federal law may not protect your tax return information from unauthorized disclosure. The duration of your consent your consent is valid for one year from the date of signature. If you believe your tax

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From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [Thompson, Christopher G. \(CMS/CMCS\)](#)
Cc: [Mikow, Asher S. \(CMS/CMCS\)](#)
Subject: PRR File - Update
Date: Wednesday, September 12, 2018 4:16:06 PM
Attachments: [9.11.2018 Master - Test for Calculations.xlsx](#)

Hey Chris,

(b)(5)

Thanks!
Jocelyn

Final # of Posted Comment (Last 4 digits of the Document ID/Pivot Comment)	Attachment?	Author First Name	Author Last Name	Location (State/ Province)	Organization	Form Letter?
4226	No	Multiple	Multiple	CA Multiples (WA/CA)	CA Write-in Campaign	Y
2073	No	Multiple	Multiple	Multiples (LA/CA/PA/VA/FL)	SEIU 775	Y
2437	No	Multiple	Multiple		-	N
6509	Yes	Jessica	Lehman	CA	Senior & Disability Action San Diego Immigrant Consortium	N
1796	Yes	Lilian	Serano	CA	Coalition of California Welfare Rights Organizations	N
1906	Yes	Kevin	Aslanian	CA		N
1396	No	Brian	Hollander	CA		N
6415	No	Multiple	Multiple	TX Multiples (TX/IN)		N
6794	No	Multiple	Multiple			N

2790	Yes	John	Winske	MA	Disability Policy Consortium	N
2800-d	Yes	Paul	Spooner	MA	Metro West Center for Independent Living	N
3819	No	Multiple	Multiple	CA	-	N
6008	No	Multiple	Multiple	FL	-	N
6574	No	Multiple	Multiple	WA	-	N
0290	No	Judith	Pierce	CA	-	N
0341	No	Buelah	Gentry	CA	-	N
0782	No	Danielle	Robinson	IL	-	N
2808	No	Multiple	Multiple	Multiple	N/A	N
2454	No	Multiple	Multiple	Multiple	N/A	N

6675	No	Multiple	Multiple
5373	Yes	Caitlin	Connolly
5730	Yes	Caitlin	Connolly
5266	Yes	Carol	Brooke
5392	Yes	Multiple	Multiple

UT, VA, IL, CA, GA, NC, AZ,
MN

Multiple

Multiple

Multiple

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N/A	N
National Employment Law Project,	Y
National Employment Law Project,	Y
North Carolina Justice Center	Y
Multiple	Y

6251	Yes	Vasu	Reddy	Multiple	National Partnership for Women and Families	Y
6276	Yes	Jessica	Stender	Multiple	Equal Rights Advocates	Y
6215	Yes	Amy	Traub	Multiple	DEMOS	Y
2534	No	Multiple	Multiple	IL, OH, TX, NC, CA	N/A	N

2375	Yes	Multiple	Multiple	MN	N/A	Y
2265	No	Multiple	Multiple	NC, MI, VA		N
5777	No	Multiple	Multiple	WA	N/A	N
6450	No	Multiple	Multiple	GA, PA, UT	N/A	N
2786	Yes	Multiple	Multiple	MA	Easter Seals Disability Services, Boston Center for independent Living	Y

3030	No	Missy	Irvin	AR	N/A	N
6680	No	Multiple	Multiple	TN	Voices of Freedom	N
5877	Yes	Multiple	Multiple	MN, CT	SEIU Healthcare	Y
6397	No	Multiple	Multiple	SC, OK	N/A	N
6503	No	Multiple	Multiple	OH, OK	N/A	N
3811						
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5340	Yes	Pearl	Gonzalez	CA	N/A	No
5865	No	Jerry	Walling	TX	N/A	No

6056	Yes	Connie	Barker	CA	N/A	No
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6364	No	Leo	Longtin	AZ	N/A	No
6545	No	Cecelia	Griffin	DC	N/A	No
532	No	Multiple	Multiple	Multiple	Write-in Campaign: CA/AL/NY/DE/WI Teamsters Local Union 186 + Home Care Workers/Bene Parents/Union Members International Brotherhood of Electrical Workers	Y
2892	Yes	Multiple	Multiple	CA		Y
2892- 2893D	Yes					
2505	No	Multiple	Multiple	Multiple (TX, NC, CA, CO, NV)	N/A	N
2121	Yes	Multiple	Multiple	CA	N/A	N
3122	No	Multiple	Multiple	MN	N/A	N
1425	No	Multiple	Multiple	AL	Union Members	N
2393	No	Multiple	Multiple	Multiple (HI, FL)	N/A	N
2404	No	Multiple	Multiple	Multiple (TX, FL)	N/A	N
2920	No	Multiple	Multiple	Multiple WA, NH)	N/A	N
5796	No	Multiple	Multiple	Multiple (VA, TN)	Voices for Freedom; N/A	N
6123	No	Multiple	Multiple	PA	N/A	N
6468	No	Carolyn	Meyer	Multiple (KS, TX)	N/A	N

6701	No	David	Doherty	MO	N/A	N
1589	No	Multiple	Multiple	Multiple	Write-in Campaign: MA, PA, IA, NV, NY, FL, TX, IL	Y
2304	No	Multiple	Multiple	Multiple	ME, CA, FL, NV, CO, TX, PA	N
4869	Yes	Multiple	Multiple	MA	Write -in Campaign: MA	Y
5921	No	Multiple	Multiple	Multiple	TX, FL, TN, MI	N
4950	Yes	Multiple	Multiple	Multiple	Illinois Alliance for Retired Americans, Community Catalysts and Multiple	Y
6079	No	Multiple	Multiple	Multiple	Write-in Campaign: MN, TX, NY	Y
1797	No	Multiple	Multiple	NY, PA	PSC-AFT	N
2774	No	Multiple	Multiple	FL, GA	Write -in Campaign	N
2869	No	Multiple	Multiple	NC,MS	Write -in Campaign	N
5438	No	Nicolae/ Maria	Jacot	WA	Freedom Foundation	N
5995	Yes	Multiple	Multiple	CA	Write-in Campaign	Y
6388	No	Multiple	Multiple	TX, NV	Write -in Campaign	N
6611	No	Multiple	Multiple	CT	Write -in Campaign	N
4876	Yes	Multiple	Multiple	Multiple (MA)	-	No
6344	No	Multiple	Multiple	Multiples(CA/MI/KS/AR)2	-	No
6534	No	Multiple	Multiple	Multiple (CA)	-	No
6582	No	Multiple	Multiple	Multiple (FL)	-	No
4774	No	Multiple	Multiple	Multiple (CA)	-	No
5944	No	Multiple	Multiple	Multiple (UT)	-	No
2810	No	Multiple	Multiple	Multiple (TX)	-	No
2779	No	Multiple	Multiple	Multiple (TX)	-	No
0008	No	Geraldo	Gonzalez	PR	-	No
2373	No	Thomas	Miller	AZ	-	No
2515	No	Kathy	Burris	TN	-	No
2890	No	Jim	Dotson	AR	-	No

		Washington			Washington State	
		State Rep.			Representative	
3128	Yes	Eileen	Cody	WA		No
4577	No	Bernice	Requenez	CA	-	No
5866	No	Sandra	Smith	AZ	-	No
5998	No	Jody	Moss	WA	Olympic Area Agency on Aging	No
6510	No	Robert	Austin	MI	-	No
6735	No	Sandy	Wolf	OH	-	No

Total # Duplicate Comments	Duplicate matches Pivot Comment?	In Support (1 = Yes) (0 =No)	In Opposition (1 = Yes) (0 =No)	Impact on Self-Direct Service Models	Special Considerations (if applicable)	Special Codes: Outside Organization/Individual - 1 Provider Advocacy Group - 2 Political- 3 State - 4	NEITHER
2514	Y	0	1	0	-	1	-
8	Y	0	1	0	-	1	-
4	y	1	0	0	stop unions from robbing	1	-
3	Y	0	1	0		2	-
0		-	-	0		2	-
0		-	-	0		2	-
0		-	-	0	References the US Supreme Court Decision in Olmsted vs. L.C. and E.W. as well as the integration mandate of the ADA of 1990	1	-
2	Y	1	0	0	stop unions from robbing	1	-
2	Y	1	0	0		1	-

					1) 30 day comment period, our lack of knowledge regarding economic significance		
1	Y	0	1		2) the rule will have negative impact on access to and quality of care		-
0	Y	-	-		30 day comment period, our lack of knowledge regarding economic significance		-
1	Y	0	1	0	-	1	-
1	Y	0	1	0	-	1	-
					caregivers must be able to choose for ourselves if we want to join,		
1	Y	1	0	0	support, or leave a union	1	-
					this new rule change oversteps a workers right to health insurance		
0	N	0	1	0	and their choice to be a union member,	1	-
0	N	0	1	0	-	1	-
					If adopted, this proposed rule would dramatically rewrite the current Medicaid statute and would disallow longstanding practices adopted by many states for the benefit of independent provider home care workers, such as deductions from their own wages for voluntary union dues and health insurance coverage,		
0	N	0	1	0	which had been deemed proper	1	-
43	Y	1	0	0	Government unions are "robbing" care givers.	1	-
34	Y	1	0	0	Government unions are "robbing" care givers.	1	-

8	Y	1	0	0	Government unions are "robbing" care givers.	1	-
1	Y	0	1	0	They claim that no Medicaid program has requested this change. The public comment period was limited to 30 days. CMS provided no rationale for this change and no economic impact analysis.	2	-
1	Y	0	1	0	They claim that no Medicaid program has requested this change. The public comment period was limited to 30 days. CMS provided no rationale for this change and no economic impact analysis.	2	-
1	Y	0	1	0	They claim that no Medicaid program has requested this change. The public comment period was limited to 30 days. CMS provided no rationale for this change and no economic impact analysis.	2	-
1	Y	0	1	0	They claim that no Medicaid program has requested this change. The public comment period was limited to 30 days. CMS provided no rationale for this change and no economic impact analysis.	2	-

1	Y	0	1	0	They claim that no Medicaid program has requested this change. The public comment period was limited to 30 days. CMS provided no rationale for this change and no economic impact analysis.	2	-
1	Y	0	1	0	They claim that no Medicaid program has requested this change. The public comment period was limited to 30 days. CMS provided no rationale for this change and no economic impact analysis.	2	-
1	Y	0	1	0	They claim that no Medicaid program has requested this change. The public comment period was limited to 30 days. CMS provided no rationale for this change and no economic impact analysis.	2	-
5	Y	1	0	0	Please stop union dues "skimming."	1	-
3	Y	0	1	0	Home care workers have obtained benefits (sick time, holiday pay, access to trainings, and wage increases) through forming unions and bargaining collectively.	3	-
2	Y	1	0	0	Stop "skimming" union dues	1	-
2	Y	1	0	0	Support CMS-2413-P	1	-
2	Y	1	0	0	Stop union "thievery"	1	-
1	Y	0	1	0	Negative impact on access to and the quality of Medicaid-funded HCBS	1	-

1	Y	1	0	0	Caregivers should choose to join a union and pay dues on their own if they see it as a beneficial opportunity.	3	-
1	Y	1	0	0	Caregivers should choose to join a union and pay dues on their own if they see it as a beneficial opportunity.	1	-
1	Y	0	1	0	SEIU claims that the proposed rule burdens individual providers' 1st amendment right to support their union, because there is no evidence that payroll deduction creates problems for home care programs and because CMS didn't conduct any impact analysis of the proposed action.	1	-
1	Y	1	0	0	Stop Government Unions from "robbing" America's caregivers	1	-
1	Y	1	0	0	Wealthy union bosses "steal" nearly \$200 million of Medicaid dollars from America's home care providers every year. Undo this "crooked" regulation and stop union dues "skimming."	1	-
0		-	-		Administratively burdensome if Rule is changed		-
0		-	-		Disproportionately impacts women and people of color.		-
0		-	-		Providers should have choice of voluntary deductions		-
1	Yes	0	1	No	Government shouldn't tell us how to spend our own money	1	-
1	Yes	1	0	No	Stop dues skimming	1	-

1	Yes	0	1	No	Administratively burdensome if Rule is changed	1	-
0		-	-		Government shouldn't tell us how to spend our own money		-
0		-	-		First amendment right to support unions		-
0		-	-		Undermines unions		-
1	Yes	1	0	No	N/A	1	-
1	Yes	1	0	No	N/A	1	-
962	Y	0	1	0		1	-
16	Y	0	1	0		1	-
0		-	-		Duplicate letter from another union		-
5	Y	1	0	0	Extrapolated comment supported reg.	1	-
3	Y	0	1	0	Each comment contains the same attachment w/ different name.	1	-
2	Y	1	0	0		1	-
1	Y	0	1	0	100% match from same person (1441) on oddity tab	1	-
1	Y	1	0	0	Extrapolated comment supported reg.	1	-
1	Y	1	0	0	Extrapolated comment supported reg.	1	-
1	Y	0	1	0	Extrapolated comment supported reg.	1	-
1	Y	1	0	0		1	-
1	Y	0	1	0		1	-
1	Y	1	0	0	Extrapolated comment supported reg.	1	-

					Extrapolated comment supported reg. 100% match from same person (6721) on oddity tab		
1	Y	1	0	0		1	-
875	Y	0	1	0		1	-
12	Y	1	0	0		1	-
5	Y	0	1	0		1	-
4	Y	1	0	0		1	-
2	Y	0	1	0		3	-
2	Y	1	0	0		1	-
1	Y	0	1	0		1	-
1	Y	1	0	0		1	-
1	Y	1	0	0		1	-
1	Y	1	0	0		1	-
1	Y	0	1	0		1	-
1	Y	1	0	0		1	-
1	Y	1	0	0		1	-
37	Yes	0	1	-	-	1	-
13	Yes	1	0	-	-	1	-
6	Yes	1	0	-	-	1	-
5	Yes	1	0	-	-	1	-
4	Yes	0	1	-	-	1	-
4	Yes	1	0	-	-	1	-
3	Yes	1	0	-	-	1	-
2	Yes	1	0	-	-	1	-
1	Yes	0	0	-	Comment in Spanish.	1	NEITHER
1	Yes	1	0	-	-	1	-
1	Yes	1	0	-	-	1	-
1	Yes	1	0	-	-	1	-

1	Yes	0	1	-	-	3	-
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1	Yes	1	0	-	-	1	-
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SUPPORT	OPPOSE		
-	OPPOSE	TOTAL NEITHER	1
-	OPPOSE	TOTAL SUPPORT	186
SUPPORT	-	TOTAL OPPOSE	4454
-	OPPOSE	TOTAL COMMEN TS WITHOUT PIVOT	4641
-	-	CHECK	4641
-	-		
-	-		
SUPPORT	-	# NEITHER # SUPPORT	45
SUPPORT	-	# OPPOSE	37

-

OPPOSE

TOTAL
PIVOTS

83

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OPPOSE

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	OPPOSE
-	OPPOSE
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-	OPPOSE
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SUPPORT	-

93	9	9
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Final # of Posted Comment (Last 4 digits of the Document ID)	Attachment?	Author First Name	Author Last Name	Location (State/ Province)
CMS-2018-0090-6677	No	Ray	Kornbau	PA
CMS-2018-0090-6679	No	Grace	Turner	FL
CMS-2018-0090-6681	No	Janet Michael &	Valigura	KS
CMS-2018-0090-6682	No	Sandra	Smith	WA
CMS-2018-0090-6683	No	Willard	Hall	IL
CMS-2018-0090-6684	No	Nadene	Franco	CA
CMS-2018-0090-6685	No	Annemarie	Maynard	CO
CMS-2018-0090-6686	No	Nancy	Mugridge	CA
CMS-2018-0090-6688	No	Myrna	I	FL
CMS-2018-0090-6689	No	Jerry	Albanese	NY
CMS-2018-0090-6691	No	Kyle	Barnett	TX
CMS-2018-0090-6692	No	Bruce	Barott	MN
CMS-2018-0090-6695	No	Richard	Blake	TX
CMS-2018-0090-6696	No	Susan	Skinner	TX
CMS-2018-0090-6697	No	TS	-	OH
CMS-2018-0090-6698	No	Anon	Anon	CA
CMS-2018-0090-6699	No	Gary & Tean	Mead	MO
CMS-2018-0090-6700	No	Mary Blyth	Cloud	CA
CMS-2018-0090-6702	No	Mark	Warner	FL
CMS-2018-0090-6703	No	Andrew	Temples	SC
CMS-2018-0090-6704	No	Robert	Crews	WV
CMS-2018-0090-6705	No	Ken	Hammel	WI
CMS-2018-0090-6707	No	William	Trivette	FL
CMS-2018-0090-6709	No	Sam	Samuelson	FL
CMS-2018-0090-6710	No	Patricia	Gilbert	PA
CMS-2018-0090-6711	No	Virginia	Iange	MA
CMS-2018-0090-6712	No	Ryan	Riedel	MI
CMS-2018-0090-6714	No	Dave	Sutter	MI
CMS-2018-0090-6715	No	Kathy	Latham	MS
CMS-2018-0090-6716	No	Dave	K	CA
CMS-2018-0090-6717	No	Carol	Copeland	CA
CMS-2018-0090-6718	No	Donald	Lynch	KY

CMS-2018-0090-6719	No	Jorge	De Cecco	CA
CMS-2018-0090-6720	No	Hugo	Ortego	NJ
CMS-2018-0090-6722	No	Karolyn	Ghosn	WA
CMS-2018-0090-6723	No	Julie	Reimer	SC
CMS-2018-0090-6724	No	Jon	Howland	RI
CMS-2018-0090-6725	No	Bonnie	MacGregor	CA
CMS-2018-0090-6726	No	Glen	Koths	MI
CMS-2018-0090-6727		Patrick	Hedger	
CMS-2018-0090-6728	No	Nancy	Kogan	AZ
CMS-2018-0090-6732	No	Dawn	Nord	ID
CMS-2018-0090-6733	No	Jane	Till	AL
CMS-2018-0090-6736	No	Rowana	Daly	MA
CMS-2018-0090-6737	No	Elizabeth	Crespo	CA
CMS-2018-0090-6738	No	Buddy	Hill	AR
CMS-2018-0090-6739	No	Sally	Mitchell	CA
CMS-2018-0090-6740	No	Laura	Bridges	AR
CMS-2018-0090-6741	No	Guy	Miller	PA
CMS-2018-0090-6742	No	David	Stecker	WI
CMS-2018-0090-6744	No	Anon	Anon	CA
CMS-2018-0090-6745	No	Judith	Brown	CA
CMS-2018-0090-6746	No	Ricchard	Brooks	CO
CMS-2018-0090-6747	No	Anthony	Musillo	NJ
CMS-2018-0090-6748	No	James	Baker	MN
CMS-2018-0090-6750	No	Stephanie	Bickham	TX
CMS-2018-0090-6751	No	Mary	Wegner	WI
CMS-2018-0090-6752	No	Margaret	Ehrke	NE
CMS-2018-0090-6753	No	Jeannie	Hassell	TX
CMS-2018-0090-6756	No	Kathy	Taylor	TX
CMS-2018-0090-6758	No	Larry	Walls	AL

CMS-2018-0090-6759	No	Ronnie	Brackett	CA
CMS-2018-0090-6760	No	Avery	Harvill	GA
CMS-2018-0090-6761	No	Pauline	Morgan	WA
CMS-2018-0090-6762	No	Ronald	Hoff	WA
CMS-2018-0090-6763	No	James	Atherton	CA
CMS-2018-0090-6764	No	Charles	Thomas	VA
CMS-2018-0090-6765	No	Carol	Welch	NC
CMS-2018-0090-6766	No	Karl	Winterhalter	IA
CMS-2018-0090-6767	No	Mickey	Frame	TX
CMS-2018-0090-6768	No	Bob	Batson	NC
CMS-2018-0090-6769	No	Bob	Ardoyn	LA

CMS-2018-0090-6770	No	Wesley	Rahe	OH
CMS-2018-0090-6771	No	jennie	Walsh	PA

CMS-2018-0090-6773	No	Terry	Brooks	MO
CMS-2018-0090-6774	No	Anon	Anon	MO
CMS-2018-0090-6775	No	Paul	Mara	MN
CMS-2018-0090-6776	No	David	Wagner	MI
CMS-2018-0090-6777	No	Anon	Anon	MO
CMS-2018-0090-6779	No	Patricia	Gleitz	IN
CMS-2018-0090-6780	No	Sandra	Ingram	FL
CMS-2018-0090-6781	No	Lake	Speed	NC
CMS-2018-0090-6782	No	Shirley	Armstrong	OH

CMS-2018-0090-6784	No	Tammy	Shipler	WA
CMS-2018-0090-6786	No	Peter	Want	ID
CMS-2018-0090-6787	No	Mark	Hesselgesser	OH
CMS-2018-0090-6788	No	Sharon	Doepping	IN
CMS-2018-0090-6789	No	Willian	Egan	MN
CMS-2018-0090-6790	No	Robert	Vitt	CO
CMS-2018-0090-6792	No	Kathrine	Tramel	OK
CMS-2018-0090-6793	No	Jim	Turic	MO

CMS-2018-0090-6796	No	Matt	Dean	MN
CMS-2018-0090-6797	No	Judith	Sommer	GA
CMS-2018-0090-6801	No	Bryan	Kelly	FL
CMS-2018-0090-6802	No	Logan	King	AR
CMS-2018-0090-6803	No	Lawrence	Pena	CA
CMS-2018-0090-6804	No	Anon	Anon	PR
CMS-2018-0090-6805	No	Shirley	Barnett	OK
CMS-2018-0090-6806	No	Dennis	Cheever	AR
CMS-2018-0090-6808	No	Julie	Tipton	AR
CMS-2018-0090-6809	No	Ken	Baer	SC
CMS-2018-0090-6278	No	Diana	Petrosian	OR
CMS-2018-0090-6279	No	Joanne	Milum	CA
CMS-2018-0090-6282	Yes			
CMS-2018-0090-6284	No	Jeanne	Dunn	FL
CMS-2018-0090-6286	No	Barbara	MacAdam	OH
CMS-2018-0090-6287	No	Robert	Schultheis	PA

CMS-2018-0090-6289	Yes	Will	Lightbourne	CA
CMS-2018-0090-6290	No	Stuart	Biegal	AZ
CMS-2018-0090-6291	No	Dwight	Scarborough	OH
CMS-2018-0090-6292				
CMS-2018-0090-6293	No	Marsha	Albertson	WA
CMS-2018-0090-6294				
CMS-2018-0090-6295	No	Charles	Bralish	CO
CMS-2018-0090-6296	No	Rendentor	Dinglassan	CA
CMS-2018-0090-6298	No	Pamela	Stout	ID
CMS-2018-0090-6300	No	John	LaPlante	MN
CMS-2018-0090-6301	No	Lynne	Morand	NC
CMS-2018-0090-6302	No	Sharon	Odom-Gorju	AL

CMS-2018-0090-6303	No	Michael	Taylor	CA
CMS-2018-0090-6304	No	Warren	Hall	NY
CMS-2018-0090-6306	No	Bruce	Cowam	WA
CMS-2018-0090-6307	No	Diane	Bingen	WI
CMS-2018-0090-6308	No	David	Courson	OH

CMS-2018-0090-6309	Yes	Lorelei	Salas	NY
CMS-2018-0090-6310	No	Fernando	Hernandez	FL
CMS-2018-0090-6311	No	Gregory	Schlueter	CA
CMS-2018-0090-6312	No	Ciara	Long	VA
CMS-2018-0090-6313	No	Brandon	Bunch	TX
CMS-2018-0090-6314	No	Gregory	Beals	OR
CMS-2018-0090-6315	No	David	Murray	WA

CMS-2018-0090-6318	No	Eugene	DePasquale	PA
CMS-2018-0090-6319	No	Larry	Lanier	GA
CMS-2018-0090-6320	No	John	Burns	IA
CMS-2018-0090-6321	No	Dawn	Pettengil	IA
CMS-2018-0090-6323	No	Sue	Pruitt	NC
CMS-2018-0090-6324	No	Ronald	Sells	CO
CMS-2018-0090-6325	No	Jane	Janrsz	TX
CMS-2018-0090-6326	No	Matthew	Robin	GA

CMS-2018-0090-6327	No	Russell	Compton	OH
CMS-2018-0090-6328	No	Joyce	Leigh	ID
CMS-2018-0090-6329	No	Justin	Hill	MO
CMS-2018-0090-6330	No	K	H	IN
CMS-2018-0090-6331	No	Marjorie	Moore	GA
CMS-2018-0090-6332	Yes			
CMS-2018-0090-6334	Yes	Marie	Zimmerman	MN
CMS-2018-0090-6335	No	Thomas	Aiello	DC
CMS-2018-0090-6336	No	Robert	Vozey	LA
CMS-2018-0090-6337	No	Glenn	Ramsey	TX
CMS-2018-0090-6338	No	Judy	Shipman	CA
CMS-2018-0090-6339	No	Lyle	Darrow	WA
CMS-2018-0090-6340	No	Gordon	Weir	AZ
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CMS-2018-0090-6343	No	Gina	Cardella	LA
CMS-2018-0090-6346	No	Walter	Benson	FL
CMS-2018-0090-6347	No	Laura	Patrick	CA
CMS-2018-0090-6349	No	Tim	Hofheins	UT
CMS-2018-0090-6350	No	Gordon	Dietz	MD
CMS-2018-0090-6352	No	Matthew	Mumbach	NY
CMS-2018-0090-6356	No	Kenny	Denton	TX

CMS-2018-0090-6357	No	Dan	Murphy	WA
CMS-2018-0090-6359	No	Justin	Cerrington	OR
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		Xavier	Becerra	
CMS-2018-0090-6363	Yes	Betty	Yee	CA
CMS-2018-0090-6366	No	Fred	Williams	TX
4963	Yes	Nanette	Jafri	OR
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4968	Yes	Susan	Justice	OR
4975	Yes	Winifred	Shafer	MT
4979	Yes	Earlene	Webster	WA
4979				
4985	No	Larry	Brown	WA
5049	Yes	N/A	N/A	CA
5059	No	Sandra	Dahlquist	WA

5064	Yes	N/A	N/A	OR
5064				
5080	No	Teri	Kraslavsky	CA
5080				
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5124	No	Rusty	Brown	MN
5128	No	Anonymous	Anonymous	WA
5130	No	Anonymous	Anonymous	MN
5133	No	Cheryl	Young	MN
5138	No	Anonymous	Anonymous	MN
5140	No	David	Vigen	WA
5141	No	Anonymous	Anonymous	MN
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5143	No	Hollee	Hembree	MN
5145	No	Janine	Yates	MN
5146	No	Jocelyn	Kraemer	MN
5149	No	Edna	Kell	OR
5150	No	Justin	Owen	TN
5151	No	Anonymous	Anonymous	MN
5153	No	Marty	Welty	MN
5155	No	Pam	Olsen	MN
5161	Yes	Dante	Vitale	CA
5162	No	Patricia	Johansen	MN
5165	No	Sheryol	Emery	MN
5168	Yes	Desharna	Johnson	CA
5169	No	Sara	Madill	MN
5172	Yes	Dinah	Thao	CA
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5173	Yes	Adriana	Mendoza de Penã	CA
5173				
5174	No	Anonymous	Anonymous	MN
5176	Yes	Alice	Lawson	CA

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5178	No	Anonymous	Anonymous	MN
5179	Yes	Alma	Delgado	CA
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5180	Yes	Efigenia	Galvan	CA
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5182	No	Emily	Polar	MN
5184	Yes	Alva	Rodriguez	CA
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5185	No	Sylvia	Mcguire	MN
5186	Yes	Elba	Ruiz	CA
5186				
5190	Yes	Frank	Chopp	WA
5190				
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5202	Yes	Jim	Abeler	MN
5204	Yes	Ellen	Green	CA
5204				
5206	Yes	Angelina	Aleman	CA
5206				
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5207	Yes	Enrique	Camacho	CA
5207				
5208	Yes	Anastasia	Melnicenco	CA
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5209	Yes	Anthony	Coleman	CA
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5210	Yes	Erma	Polar	CA
5210				
5214	Yes	Arianna	Garland	CA
5214				
5214				
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5217	Yes	Gloria	Echevarria	CA
5217				
5218	No	Willard	Gibbs	WA
5221	Yes	Barbara	Bondurant	CA
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5223	Yes	Gabriella	Ruiz	CA
5223				
5224	Yes	Beronica	Batuista	CA
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5226	Yes	Bonita	Munoz	CA
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5226				
5227	Yes	Bradley	Wiedmaier	CA
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5228	Yes	Gum	Leung	CA
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5230	Yes	Brittany	Williams	CA
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5231	Yes	Herminia	Maravilla	CA
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5231				
5232	Yes	Camille	Christian	CA
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5235	Yes	Holly	Hickenbottom	CA
5235				
5238	Yes	Hripsime	Tamazyan	CA
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5239	Yes	Irma	Recinos	CA
5239				
5240	Yes	Carmen	Pastran	CA
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5243	Yes	Carol	Thomas	CA
5243				
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5245	Yes	Jaqueline	Edwards	CA
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5247	Yes	Cecili	Hu	CA
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5250	Yes	Janet	Lopez	CA
5250				
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5251	Yes	Janice	Love	CA
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5253	Yes	Jeffrey	Nary	CA
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5255	Yes	Jennifer	Turner	CA
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5256	Yes	Cely	Inda	CA
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5257	Yes	Jimmy	Flores	CA
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5258	Yes	Cenia	Peters	CA
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5261	Yes	Cheryl	Garland	CA
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5262	Yes	Debra	Hunt	CA
5263	Yes	Cheryl	Stubbs	CA
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5263				
5264	Yes	Jocelyn	Sanders	CA
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5268	Yes	Chue	Berriel	CA
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5269	Yes	Chuck	Weaver	WA
5270	Yes	Jooana	Amiryan	CA
5270				
5271	Yes	Cindy	Raheem	CA
5271				
5271				
5273	Yes	Josefina	Ramirez	CA
5273				
5273				
5275	Yes	Cerenia	Torres	CA
5275				
5277	Yes	Cozette	Miller	CA
5277				
5279	Yes	Joseph	Franco	CA
5279				
5282	Yes	Juanita	Chavez	CA

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5284 Yes Judy Han CA
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5286 Yes Marguerite Johnson CA
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5288 Yes Maria Alvarez CA
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5291 Yes Maria Arreola CA
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5295 Yes Maria Benitez CA
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5296 Yes Julie Chow CA
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5297 Yes Maria Cibrian CA
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5298 Yes Maria Delgado CA

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5301 Yes Maria Lopez CA
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5302 Yes Maria Hernandez CA
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5305	Yes	Keyoun	Walters	CA
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5307	Yes	Maria Patricia	Hernandez	CA
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5308	Yes	Maria	Valdez	CA
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5309	No	Lillie	Peterson	WA
5310	Yes	Khachatour	Gharapetian	CA
5310				
5310				
5312	Yes	Mary	Aparicio	CA
5312				
5312				
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5315	Yes	Kim	Ballon	CA
5315				
5315				
5316	Yes	Marylou	Angel	CA
5316				
5316				
5316				
5317	Yes	Michelle	Reed	CA
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5319	Yes	Mina	Serrano	CA
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5320	Yes	Kwangja	Shin	CA

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5323	Yes	Leonard	Camerina	CA
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5324	Yes	Lesia	Luoro	CA
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5325	Yes	Nicolasa	Arevalo	CA
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5326	Yes	Nicole	Neff	CA
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5326				
5327	Yes	Leslie	Williams	CA
5327				
5328	Yes	Norma	Zelaya	CA
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5329	Yes	Greg	Smith	OR
5329				
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5330	Yes	Olga	Evans	CA
5330				
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5332	Yes	Patrice	Brown	CA
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5333	Yes	Nadine	Moore	CA
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5337	Yes	Patricia	Bryson	CA
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5338	Yes	Patricia	Santana	CA
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5339	Yes	Patricia	Watkins	CA
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5341	Yes	Petra	Payan	CA
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5350	No	K	M	WA
5351	Yes	Rachelle	Lewis	CA
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5355	No	Diantha	Doucette	WA
5356	No	Thomas	Holman	OH
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5358	Yes	Roberto	Rodriguez	CA
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5361	Yes	Karla	Walter	DC
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5362	Yes	Sandra	Medina	CA
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5363	No	Fabiola	Kocks	WA
5365	Yes	Sarah	Esqueda	CA
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5366	Yes	Scott	Temple	CA
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5368	Yes	Sharie	Washington	CA
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5371	Yes	Sharron	McNeil	CA
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5374	No	Sandi	Caldrone	IN
5375	No	Frederick	Brinbaum	ID
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5378	Yes	Sheri	Perez	CA
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5380	Yes	Sonja	Krantz	CA
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5381	No	Larry	Ratts	WA
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5382	No	Suk	Kim	CA
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5383	No	Dave	R.	WA
5384	No	Susan	Baber	CA
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5388	No	Don	Bliss	CA
5389	No	Tim	McMahon	WA
5399	Yes	Tim	Foley	MA
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5401	No	Shannon	Hensley	WA
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5401

5410	No	Tom	Harrison	OR
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5410

5411	No	Kathryn	Jackson	WA
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5418	No	Charles	Noll	OR
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5423	No	Gregory	Kelley	IL
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5431	Yes	Amber	Smock	IL
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5431				
5432	Yes	Jackie	Simila	OR
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5436	No	Robin	Elenga	WA
5439	No	Scott	Samuelson	WA
5441	No	Tammi	Stewart	WA
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5445	No	Cathy	Lindsay	WA
5446	Yes	Theresa	Hindsman	CA
5446				
5448	Yes	Thomas	Xiong	CA
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5449	No	Mary	Louie	WA
5449				
5450	Yes	Tiffany	Mays	CA
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5452	Yes	Tiffany	Smith	CA
5452				
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5457	Yes	Tracy	Mills	CA
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5459	Yes	Yi	Gao	CA
5459				
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5460	Yes	Yueh Pi	Chang	CA
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5462	Yes	Yvette	Square	CA
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5463	Yes	Zaraf	Ali	CA
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5466	No	N/A	N/A	MA
5476	No	Rosemary	Graham-Gardner	CA
5477	No	Terrence	Richards	CA
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5478	No	Anonymous	Anonymous	WA
5479	No	Casey	Directo	CA
5483	No	Elizabeth	Dodd	WA
5489	No	Tedene	Myrick	WA
5491	No	C. Dean	Hobson	WA
5492	No	Donald	Eden	WA
5496	No	Christine	Seboe	WA
5502	No	Anonymous	Anonymous	WA
5505	No	Anonymous	Anonymous	WA
5506	No	Joann	Norton	VA
5509	No	Karen	Conchar	VA
5512	No	Anonymous	Anonymous	WA
5517	No	Martha	Dickerson	WA
5535	Yes	Richard	Yrjanson	WA
5545	No	Anonymous	Anonymous	MN
5546	No	Anonymous	Anonymous	MN
5548	No	Maria	Kalugin	OR
5563	No	Anonymous	Anonymous	WA
5577	No	Carolyn	Haines	CA
5577				
5579	No	Margaret	Sharpan	CA
5601	No	Khadiga	Ahmend	CA
5610	No	Bradley	Boardman	WA
5611	No	Vibinna	Saavedra	CA
5612	No	Ruby	Grayes	CA
5612				
5613	No	Laurie	Shaw	MN
5614	No	Anonymous	Anonymous	MN
5615	No	Dian	Nicholson	CA
5616	No	Allene	Villa	CA
5616				
5617	No	Silvia	de Grijalva	CA
5618	No	Josh	W	MN
5622	No	Rosita	Whittaker	CA
5625	No	Margaret	Edwards	CA
5625				
5628	No	Jennifer	Parish	MN

5631	No	Sue	Hilton	CA
5633	No	Karen	Blaine	MN
5637	No	Melody	Beale-Garcia	CA
5644	Yes	Lori	Smetanka	DC
5644				
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5645	No	Susan	Smolski	WA

5653	Yes	Craig	Becker	DC
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5664	No	Ana	Bodin	WA
5665	No	Anonymous	Anonymous	MN
5667	No	A	Jensen	WA
5679	No	Cheryl	White	CA
5680	No	Catherine	Rose	CO
5682	No	Russel	Brown	FL
5684	No	Christopher	Lish	CA
5684				
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5687	No	Aundrea	Montenegro	CA
5688	No	Catherine	Montenegro	CA
5688				
5689	No	Leslie	Lofton	CA
5690	No	Tanisha	Crane	CA
5690				
5690				
5691	No	Regina	Coleman	CA
5691				
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5692	No	Spryng	Duggan	CA
5692				
5693	No	Santiago	Sada	CA
5693				
5694	No	Marlett	Vizcarra	CA
5694				

5696	No	Francis	Sanchez	CA
5698	No	Maria	Hernandez	CA
5699	No	Daniel	Osuna	CA
5699				
5699				
5699				
5700	No	En	Wergin	CA
5701	No	Beatriz	Galvan	CA
5702	No	Linda	Rodriguez	CA
5703	No	Maria	Roach	CA
5732	No	James	Deller	WA
5733	No	Kim	Stern	MN
5741	No	Caroline	Harding	WA
5742	No	Yvonne	Slenning	WA
5743	No	Patti	Peery	WA
5748	Yes	Lephonza	Butler	CA
5748				
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5752	Yes	Rosario	Cabrera	MA
5752				
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5754	Yes	Milika	Exantus	MA
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5755	No	James	Normal	WA
5756	Yes	Melody	Benjamin	IL
5756				
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5757	Yes	Paralee	Stewart	IL
5757				
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5762	No	Beth	Brummer	MN
5765	No	David	Rolf	WA
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5766	No	Germaine	Williams	MN
5768	No	Carol	Shetler	WA
5771	No	Donn	Shetler	WA
5778	No	Brett	Odom	VA
5781	Yes	William	Messenger	VA
5781				
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Yes

Neil

Parrott

MD

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5793	Yes	N/A	N/A	MI
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5797	Yes	Mary	Canepa	TN
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5798	Yes	Jeanette	Thornton	DC
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5799	Yes	Kevin	Kenzie	TN
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5800	No	James	Monaco	TX
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5801	Yes	Martha	Roherty	DC
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5803	No	Molly	Dragstrem	NC
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5804	Yes	John	Tillman	IL
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5805	No	Veronica	Lasko	PA
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5806	No	Lou	Leonardo	VA
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5807	No	David	Kipple	OK
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5809	Yes	Francis	Padilla	CT
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5810	No	Cynthia	Wheeler	OH
5811	Yes	Catherine	Abercrombie	CT
5811				
5811				
5812	No	Jillian	Nemec	DC
5814	No	Leo	Gould	NH
5815	Yes	Ceci	Connolly	DC

5815				
5815				
5817	No	Ruth	Pittman	ID
5820	No	Carol	Sheckey	FL
5821	No	Hazard	Hawk	AZ
5822	No	Gregory	Harris	FL
5823	No	Charles	Morris	TN
5824	No	Michael	Alkire	MO
5825	No	David	Haburjak	NC
5826	No	Michael	Wahl	OH
5827	No	Carole	Hook	FL
5829	No	Howard	Harbes	TX
5830	No	Steve	Sunderland	MO

5831	Yes	Jessica	Barnett	PA
5831				
5832	No	Crispina	Mirasol	NJ
5833	Yes	Mary Kay	Henry	DC
5833				

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5835	Yes	Jim	Stergios	MA
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5837	No	James	Shaw	ID
5839	Yes	Celine	McNicholas	N/A

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5840	No	Aluara	Morrison	IN
5842	No	Glenda	Taton-Allen	CO
5844	No	Ronald	Snyder	OH
5845	No	Judy	Steele	PA
5846	No	William	Wilson	MO

	5847	No	Sal	Nuzzo	FL
	5848	No	O.H.	Mittleberg	MI
	0002	Yes	David	Addington	DC
	0003	No	Jorge	Guzman-Ortiz	PR
	0004	No	Lee	Shum	PR
	0005	No	Angela	Robles	PR
	0006	No	Dr.	Ramirez	PR
	0007	No	Rafael	Ramirez	PR
0008		No	Geraldo	Gonzalez	PR
0009		No	Vivian	Torres	PR
0010		No	Nivia	Souffront	PR
0011		No	Elsie	Negron	PR
0012		No	Kelvin	Gonzalez	PR
0013		No	Vanessa	Santini	PR
0014		No	David	Carballeira	PR
0015		No	Ramon	Ramirez	FL
0016		No	Carmen	Ceballos	PR
0017		No	Pedro	Bonet	NJ
0018		No	Jose	Badillo	PR
0019		No	Noel	Arnau	PR
0021		No	Cheryl	Taaffe	FL
0411		No	Patricia	Papai	CA
0419		No	Blanca	Ramos	CA
0519		Yes	Gary	Passmore	CA
0596		No	Mary	Tinker	CA
0637		No	Ruth	Wooden	CA
0751		No	Deanna	Wright	CA
0786		No	Dana	Shilling	NJ
0810		No	John	McClaghry	VT
0857		No	Cynthia	Bennett	CA
0881		No	Wesley	Ether	CA

0941	No	Betty	Traynor	CA
0981	No	Nanette	Parratto-Wagner	FL
0993	No	Anonymous	Anonymous	WI
1275	No	Meg	Hansen	VT
1340	No	Guillermo	Bolaos	PR
1388	No	Theresa	Bald	DE
1402	No	Sandra	McCune	TN
1423	No	Margaret	Okuzumi	CA
1449	No	Melissa	Barling	CA
1479	No	Iris	Yipp	IL
1503	No	Diane	Ballou	VT

1531	Yes	Madeline	Offerman	CA
CMS-2018-0090-1535	No	Elana	Buch	IA
CMS-2018-0090-1564	No	Rosalie	Calhoun	NV
CMS-2018-0090-1569	No	Richard	Wells	LA

CMS-2018-0090-1570	Yes	Caitlin	Connolly	DC
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CMS-2018-0090-1597	Yes	Roger	Klein	OH
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CMS-2018-0090-1600	No	Robert	Boada	PR
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CMS-2018-0090-1606	No	Julie	Dupr	MN
CMS-2018-0090-1607	No	Felix	Ruiz	PR
CMS-2018-0090-1608	Yes	Scott	Coffin	CA
CMS-2018-0090-1610	No	Robert	Sojo	PR
CMS-2018-0090-1612	Yes	Melody	Benjamin	DC
CMS-2018-0090-1613	Yes	Xavier	Becerra	CA
CMS-2018-0090-1615	No	Armando	Tristani	PR
CMS-2018-0090-1620	No	Raul	Torres	PR
CMS-2018-0090-1621	No	Leigh	Campbell-Hale	CO
CMS-2018-0090-1623	No	Ruth	Needleman	IN
CMS-2018-0090-1625	No	Harold	Garrett-Goodyear	MA
CMS-2018-0090-1626	No	Srilakshmi	Vankina	MN
CMS-2018-0090-1627	No	Luis	Cummings	PR

CMS-2018-0090-1628	No	Jennifer	Guglielmo	MA
CMS-2018-0090-1629	No	Peter	Shapiro	CA
CMS-2018-0090-1630	No	Henry	Himes	OH
CMS-2018-0090-1631	No	Sarah	Leyrer	WA
CMS-2018-0090-1634	No	Barbara	Gabriel	NY
CMS-2018-0090-1635	No	John	Lawrence	NY
CMS-2018-0090-1636	No	Karen	Miller	NY
CMS-2018-0090-1638	No	Erik	Freas	NY
CMS-2018-0090-1639	No	Ben	Lipkin	NJ
CMS-2018-0090-1640	No	James	Davis	NY
CMS-2018-0090-1641	No	Lando	Storrs	IA
CMS-2018-0090-1642	No	David	bates	IL
CMS-2018-0090-1649	No	Ian	Ringgenberg	MN
CMS-2018-0090-1650	No	David	Arnow	NY
CMS-2018-0090-1652	No	Marc	Kagan	NY

CMS-2018-0090-1658	No	Anh	Tran	NY
CMS-2018-0090-1660	No	Martin	Halpern	WI
CMS-2018-0090-1668	No	Jen	Estruth	NY

CMS-2018-0090-1670	No	Patrick	Ishmael	MO
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CMS-2018-0090-1671	No	Steven	Kreisberg	DC
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CMS-2018-0090-1677	No	Bob	Rossi	OR
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CMS-2018-0090-1684	No	Staci	Anonymous	MN
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CMS-2018-0090-1685	No	Sandra	Guillebeaux	AL
CMS-2018-0090-1697	No	Rudi	Batzell	IL

CMS-2018-0090-1704	No	John	Metzgar	IL
CMS-2018-0090-1725	No	Margaret	Roisum	WA

CMS-2018-0090-1727	No	Stacy	Kono	CA
CMS-2018-0090-1728	No	Jeanne	Kellner	WA
CMS-2018-0090-1730	No	Anonymous	Anonymous	WA

CMS-2018-0090-1732	No	Peter	Cole	IL
CMS-2018-0090-1736	No	Sharon	Furlong	PA
CMS-2018-0090-1742	No	Roberta	Lie	MA
CMS-2018-0090-1749	No	William	Matos	PR
CMS-2018-0090-1750	No	Theresa	Case	TX

CMS-2018-0090-1751	No	Anonymous	Anonymous	PR
CMS-2018-0090-1752	No	Manuel	Medina	PR

CMS-2018-0090-1753	No	A	Ortiz	PR
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CMS-2018-0090-1754	No	Francisco	Leal	PR
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CMS-2018-0090-1755	No	William	Hurtado	PR
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CMS-2018-0090-1760	No	Ed and Joy	Smith	WA
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CMS-2018-0090-1762	No	Felix	SCHMIDT	PR
CMS-2018-0090-1766	No	Bill	Rosenthal	NY
CMS-2018-0090-1767	No	Robyn	Muncy	MD
CMS-2018-0090-1770	No	Lilia	Fernandez	NJ
CMS-2018-0090-1772	No	John	Curtis	DC
CMS-2018-0090-1773	No	Pete	Anonymous	MN
CMS-2018-0090-1777	No	Anonymous	Anonymous	WA
CMS-2018-0090-1780	No	Linda	Murphy	OR
CMS-2018-0090-1781	No	Anonymous	Anonymous	OR
CMS-2018-0090-1782	Yes	Christina	Suggett	CA

CMS-2018-0090-1783	Yes	Lisa	Nelson	VA
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CMS-2018-0090-1789	Yes	Josh	Nace	CA
CMS-2018-0090-1792	No	Anonymous	Anonymous	PR

CMS-2018-0090-1793	Yes	Ashley	Varner	VA
CMS-2018-0090-1794	No	Timothy	Bartley	MO

CMS-2018-0090-1795	No	Lorna	Zukas	CA
CMS-2018-0090-1798	No	Linda	Hyatt	WA

CMS-2018-0090-1799	No	Jim	Vokal	NE
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CMS-2018-0090-1800	Yes	Ron	Johnson	DC
CMS-2018-0090-1801	No	Anonymous	Anonymous	PR
CMS-2018-0090-1802	No	Claire	Knierim	WA

CMS-2018-0090-1803	No	Paul	Gessing	NM
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CMS-2018-0090-1804	Yes	Brent	Gardner	VA
CMS-2018-0090-1805	No	Anonymous	Anonymous	WA

CMS-2018-0090-1806	No	Chris	Tilly	CA
CMS-2018-0090-1807	No	Anonymous	Anonymous	PR

CMS-2018-0090-1808	No	Miranda	Thorpe	WA
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CMS-2018-0090-1809	No	Elaine	Dunlap	WA
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CMS-2018-0090-1810	No	Michael	Jahr	WI
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CMS-2018-0090-1811	Yes	Tamara	Jackson	WI
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CMS-2018-0090-1812	Yes	Douglas	Seaton	MN
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CMS-2018-0090-1814	No	Kristina	Rasmussen	FL
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CMS-2018-0090-1817	No	Matthew	Finnell	WA
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CMS-2018-0090-1818	Yes	Mark	Schoesler	WA
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CMS-2018-0090-1819	Yes	Randi	Becker	WA
CMS-2018-0090-1821	No	Martin	Gorrochategui	PR
CMS-2018-0090-1822	No	William	Easton	FL
CMS-2018-0090-1824	No	Eileen	Reed	PA

CMS-2018-0090-1825	No	gail	friedman	PA
CMS-2018-0090-1826	No	OSCAR	cardona	PR
CMS-2018-0090-1828	No	Bethany	Marcum	AK

CMS-2018-0090-1832	No	Juan	Gonzalez	CA
CMS-2018-0090-1838	No	Megan	Marks	WA
CMS-2018-0090-1840	No	Anonymous	Anonymous	WA
CMS-2018-0090-1841	No	Bridgette	McCoy	WA
CMS-2018-0090-1850	No	Chelsea	Markovich	WA
CMS-2018-0090-1852	No	Pennie	Knott	WA
CMS-2018-0090-1853	No	Jennifer	Dickson	WA

CMS-2018-0090-1857	Yes	Eileen	Boris	CA
CMS-2018-0090-1887	No	Mary	Feist	WA
CMS-2018-0090-1889	No	Parker	Snider	AL

CMS-2018-0090-1891	No	Carla	Wal	WA
CMS-2018-0090-1892	No	Craig	Jones	WA

CMS-2018-0090-1893	Yes	Mike	Padden	WA
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CMS-2018-0090-1895	No	Anonymous	Anonymous	MA
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CMS-2018-0090-1896	Yes	Anonymous	Anonymous	NC
CMS-2018-0090-1897	No	Jean	Freeman	WA
CMS-2018-0090-1898	No	Julene	Weaver	WA
CMS-2018-0090-1899	Yes	David	Addington	DC

CMS-2018-0090-1900	Yes	Kristine	Loomis	CA
CMS-2018-0090-1901	No	Loren	Freeman	WA

CMS-2018-0090-1902	No	Dawn	Morris	WA
CMS-2018-0090-1903	Yes	Nan	Brasmer	CA
CMS-2018-0090-1904	Yes	Judy	Wilkinson	CA
CMS-2018-0090-1905	No	Anonymous	Anonymous	WA
CMS-2018-0090-1907	No	Linda	Wasserman	WA
CMS-2018-0090-1908	No	Patricia	Wild	WA
CMS-2018-0090-1940	No	Thomas	Street	WA
CMS-2018-0090-1951	No	Dan	Ryan	WA
CMS-2018-0090-1960	No	Phyllis	Dolph	WA
CMS-2018-0090-2003	No	Katie	Woodland	WA
CMS-2018-0090-2011	No	Anonymous	Anonymous	WA
CMS-2018-0090-2023	No	Latricia	Sanchez	CA
CMS-2018-0090-2024	No	Ryan	Riedal	MI
CMS-2018-0090-2026	No	John	Strup	NC
CMS-2018-0090-2027	No	Bill	Webster	AZ
CMS-2018-0090-2028	No	Roy	Longuet	TX
CMS-2018-0090-2029	No	DeWayne	Crater	WA
CMS-2018-0090-2030	No	Dean	Wilkey	VA
CMS-2018-0090-2032	No	Bruce	Barott	MN
CMS-2018-0090-2033	No	Susan	Carson	TX
CMS-2018-0090-2034	No	Joan	Murbach	AZ
CMS-2018-0090-2037	No	Janet	Ulmer	IL
CMS-2018-0090-2038	No	John	Oneil	OH
CMS-2018-0090-2039	No	David	Coeur	CA
CMS-2018-0090-2041	No	Grace	gabrielsen	IA
CMS-2018-0090-2042	No	Nancy	Ordowski	AZ
CMS-2018-0090-2044	No	Michael	Bellinger	UT
CMS-2018-0090-2045	No	Sue	Fowler	MI
CMS-2018-0090-2046	No	Madeline	Jones	GA
CMS-2018-0090-2047	No	Annemarie	Maynard	CO
CMS-2018-0090-2048	No	Wayne	Landry	FL
CMS-2018-0090-2049	No	Brett	Layser	UT
CMS-2018-0090-2050	No	Sandra	Stake	CA
CMS-2018-0090-2051	No	Tod	bartholomew	MI
CMS-2018-0090-2052	No	Marc	Jeric	NV
CMS-2018-0090-2053	No	Virigina	lange	VA
CMS-2018-0090-2054	No	Terri	Barnhart	OR
CMS-2018-0090-2055	No	Paula	Kellar	PA
CMS-2018-0090-2056	No	Debra	Clayton	MI
CMS-2018-0090-2057	No	Ralph	patch	AZ
CMS-2018-0090-2058	No	Epifanio	Cruz	AL
CMS-2018-0090-2059	No	Ron	Roberds	UT

CMS-2018-0090-2060	No	Anonymous	Anonymous	WA
CMS-2018-0090-2065	No	Katherine	Paul	WA
CMS-2018-0090-2067	No	Ana	Avellanet	PR

CMS-2018-0090-2068	No	Kaylo-Alexis	Alvarez	WA
CMS-2018-0090-2069	No	Multiple	Multiple	DC
CMS-2018-0090-2070	No	Monica	Anonymous	WA
CMS-2018-0090-2071	No	Deanna	Kettwig	WA
CMS-2018-0090-2077	No	Edward	Neumann	WA
CMS-2018-0090-2082	No	Anonymous	Anonymous	PR

CMS-2018-0090-2083	Yes	Kimberly	Crockett	MN
CMS-2018-0090-2084	No	Anonymous	Anonymous	WA
CMS-2018-0090-2085	No	Guy	Coe	WA
CMS-2018-0090-2088	No	Al	DeKruif	MN
CMS-2018-0090-2089	No	Chris	Naticchia	CA
CMS-2018-0090-2091	No	Kris	Greene	MN
CMS-2018-0090-2092	No	karl	Peterjohn	KS
CMS-2018-0090-2095	No	Daravadee	Mann	WA
CMS-2018-0090-2096	No	Brittany	Hampton	WA
CMS-2018-0090-2097	No	Rhonda	Parker	WA
CMS-2018-0090-2098	No	Yesenia	Avelar	WA
CMS-2018-0090-2101	No	Regina	Denton	WA
CMS-2018-0090-2102	No	Anonymous	Anonymous	WA
CMS-2018-0090-2103	No	Sandra	Lund	WA

CMS-2018-0090-2104	Yes	Laurel	Mildred	CA
CMS-2018-0090-2112	No	Billie	Whittle	WA

CMS-2018-0090-2115	Yes	Fred	Barrows	MA
CMS-2018-0090-2117	Yes	Jose	Felix	CA
CMS-2018-0090-2123	Yes	Lcediuna	Garcia	CA

CMS-2018-0090-2124	Yes	Jeffery	Smith	CA
CMS-2018-0090-2125	No	Linda	Griffin	FL
CMS-2018-0090-2126	No	Tiothy	Spong	DE
CMS-2018-0090-2127	No	Debbie	Sorensen	ND
CMS-2018-0090-2128	No	Leah	Helmer	NY
CMS-2018-0090-2129	No	Esther	Smith	WA
CMS-2018-0090-2131	No	Morris	Whitwer	KY
CMS-2018-0090-2132	No	Donna	Doran	MN
CMS-2018-0090-2134	No	Barbara	Bowen	ME
CMS-2018-0090-2135	No	Billie	McClune	CA
CMS-2018-0090-2136	No	Debra	Estridge	KY
CMS-2018-0090-2137	No	Nancy	Kogan	AZ

CMS-2018-0090-2138	No	Donna	Moss	CA
CMS-2018-0090-2139	No	Edward	Sebastian	MD
CMS-2018-0090-2140	No	Michael	Dielo	CA
CMS-2018-0090-2141	No	Dustin	Granger	TX
CMS-2018-0090-2142	No	Suzanne	Sabadash	FL
CMS-2018-0090-2143	No	Leo	Longtin	AZ
CMS-2018-0090-2144	No	Wenjing	Lin	CA
CMS-2018-0090-2145	No	Barbara	Richardson	TN
CMS-2018-0090-2146	No	Nancy	Peters	FL
CMS-2018-0090-2147	No	Susan	Skinner	TX
CMS-2018-0090-2148	No	Elizabeth	Sams	NC
CMS-2018-0090-2149	No	Jeannine	Mootz	TX
CMS-2018-0090-2150	No	Kathy	Taylor	TX
CMS-2018-0090-2151	No	Auke	Hart	MO
CMS-2018-0090-2152	No	William	Price	CA
CMS-2018-0090-2153	No	Sally	Rogers	TN
CMS-2018-0090-2154	No	Bonnie	Kaiser	MT
CMS-2018-0090-2155	No	Rodney	Crites	MI
CMS-2018-0090-2157	No	Peter	Elredge	ME
CMS-2018-0090-2158	No	Karen	Rowe	GA
CMS-2018-0090-2159	No	Steve	Grimes	TX
CMS-2018-0090-2161	No	Margaret	Lyons	CA
CMS-2018-0090-2162	No	Kayleigh	Somers	WA
CMS-2018-0090-2164	No	Sherry	Norquist	VA
CMS-2018-0090-2165	No	Barb	Brown	KS
CMS-2018-0090-2167	No	Tay	Norquist	VA
CMS-2018-0090-2168	No	John	Inks	CA
CMS-2018-0090-2169	No	Albert	Simpson	FL
CMS-2018-0090-2170	No	Glenda	Taton-Allen	CO
CMS-2018-0090-2171	No	James	Scheuer	CA
CMS-2018-0090-2173	No	Sean	Dulaney	WA
CMS-2018-0090-2175	No	Myrna	Anderson	UT
CMS-2018-0090-2176	No	Elaine	Schuler	MD
CMS-2018-0090-2177	No	Cherlyn	Akerly	CO
CMS-2018-0090-2179	No	Sue	Buther	NC
CMS-2018-0090-2180	No	Lorraine	Brown	SC
CMS-2018-0090-2181	No	Eric	Hopkins	ID
CMS-2018-0090-2183	No	Ross	Crow	SC
CMS-2018-0090-2184	No	David	Drake	TX
CMS-2018-0090-2185	No	Dianne	Nelson	OH
CMS-2018-0090-2186	No	Richard	Knodel	OH
CMS-2018-0090-2187	No	Joseph	DuBois	VA
CMS-2018-0090-2189	No	Nancy	Armstrong	OR
CMS-2018-0090-2190	No	Paul	Feeser	TX
CMS-2018-0090-2191	No	Leo	Garry	MO

CMS-2018-0090-2192	No	Walter	Dany	SC
CMS-2018-0090-2193	No	Larry	McCarthy	OH
CMS-2018-0090-2194	No	Elizabeth	Parker	MI
CMS-2018-0090-2196	No	Catherine	Gavend	CO
CMS-2018-0090-2197	No	John	Casey	NE
CMS-2018-0090-2198	No	William	Ackley	AZ
CMS-2018-0090-2199	No	Brad	Folkedahl	IA
CMS-2018-0090-2200	No	Walter	Bunyea	VA
CMS-2018-0090-2201	No	Edward	Lachut	AL
5849	Yes	Stan	Sorscher	WA
5850	No	Alex	Vainstein	AL
5851	Yes	Chris	Rochester	WI
5852	No	Gcc	Garland	TX
5853	No	Larry	Skinner	TN
5854	No	Philippe	Boeing	GA
5857	No	SJ	Jones	TN
5860	No	Steve	Rainey	TN
5861	No	Ronald	Ginochi	CA
5862	No	Sarah	Laslett	OR
5863	No	Pastor	Gliddon	NV
5867	No	Margaret	Helin	IL
5868	No	James	McKelvey	OH
5869	No	Thomas	Potts	SC
5870	No	Ignacio	Cardenas	CA
5872	No	Frank	Giuffre	PA
5873	No	Gary	LaPrade	VA
5874	No	Darlene	Craig	FL
5875	No	Robert	Philippi	TX
5878	No	Thomas	Lindsay	TX
5879	No	Joseph	Sarcone	MA
5880	No	Denise	Miles	OK
5882	No	Chuck	DeVore	TX
5885	No	Evan	Gerber	NV
5886	No	Ivars	Loce	NJ
5889	No	Linda	Crawford	CA
5891	No	Robert	Burckes	IN
5892	No	Sraddha	Durand	WA
5893	No	Tom	Strings	FL
5894	No	Troy	Harding	CA
5896	No	Robert	Sutton	NJ
5898	No	Norma	Kelsy	WA
5902	No	Frank	Kroger	WA
5903	No	Matthew	Meginnes	OH
5904	No	Margaret	Cooper	UT
5907	No	James	Somervell	KY
5910	No	Joyce	Boren	MO
5911	No	Sam	McCord	IA

5912	No	Melissa	Hortman	MN
5914	No	Michael	Galea	NV
5913	No	C	Adkins	GA
5917	No	Marge	Olson	WI
5919	No	Terrell	Gray	TX
5922	No	Tammy	Schmoll	TX
5925	No	James	Strutz	MN
5926	No	Richard	Cook	IL
5927	No	Joe	Janecky	CO
5929	No	Katherine	Greer	TX
5930	No	Larry	Haun	TX
5931	No	Connie	Martinez	CA
5932	No	John	Johnson	CA
5933	No	Sharon	Enright	IN
5938	No	Steve	Tucker	CA
5939	No	Christina	Lozano	CA
5941	No	Laura	Meda	CA
5943	No	Eduardo	Andrade	FL
5946	No	Vicky	Nguyen	CA
5947	No	Dan	Driscoll	NV
5948	No	Gerald	Hughes	TN
5949	No	Noah	Kirklan	CA
5950	No	Dustin	Lambro	WA
5951	No	John	O'Neill	WA
5952	No	Ray	Hales	CA
5953	No	Sergio	Maldonado	CA
5954	No	Henry	Mackey	AZ
5956	No	Shelba	Holmes	GA
5957	No	Flerida	Rocha	CA
5958	No	Faye	VanDevender	PA
5959	No	Rito	Hernandez	CA
5960	No	Joe	Mabel	WA
5961	No	Barbara	White	OH
5963	No	Joseph	Kleber	CA
5965	No	Jim	Kaeseberg	AZ
5966	No	Richard	Spaur	CA
5967	No	Susan	Tran	CA
5967	No	Cathy	Witthoeft	MN
5969	No	Peter	Carminati	ME
5971	No	Richard	Palmer	WA
5973	No	Judith	Brown	MI
5974	No	Joseph	Ramirez	CA
5975	No	Ron	Christopher	PA
5977	No	Mary	Flinn	OH
5978	No	Philip	Babish	FL
5979	No	Toni	Dean	VA
5980	No	Nancy	Trocke	MN

5982	No	William	Nesbitt	NC
5983	No	Dennis	Wellman	NY
5984	No	William	Watts	MS
5985	No	Bob	Eifrig	CA
5986	No	William	Hastie	NC
5989	No	Rodney	Bailey	TX
5990	No	David	Coeur	CA
5991	No	Steve	Davis	TN
5994	No	Thomas	Klingel	FL
5996	No	Randy	Hartman	CA
5997	No	Margaret	Taylor	WA
5999	No	George	Griffin	OR
6001	No	Maya	Callahan	OH
6004	No	Denny	Bissell	OK
6005	No	Yvette	Willians	CA
6007	No	Patsy	Sanderson	CA
6009	No	Clifford	Bruber	MN
6010	No	Paula	Powers	FL
6011	No	Robert	Miller	SC
6012	No	Janet	Fetherman	AZ
6013	No	Noel	Marchillo	FL
6014	No	Katherine	Williamson	PA
6015	No	Claire	Lewis	FL
6016	No	Tom	Weis	NE
6017	No	Ken	Phillips	AZ
6018	No	Paula	Buckel	FL
6019	No	Sylvia	Harria	OK
6020	No	Graydon	Tunstall	FL
6021	No	Joni	Mona	SC
6022	No	Juston	Hong	VA
6023	No	Kelly	Mcconnell	KS
6024	No	William	Nash	OR
6026	No	Sandra	Ingram	FL
6030	No	Chris	Grange	UT
6031	No	William	Pelletier	ME
6033	No	Kenneth	Lyon	OK
6034	No	Justin	Hong	VA
6035	No	William	Eddington	MI
6036	No	Gary	Gregoire	MT
6037	No	Adelaid	Rush	AK
6038	No	Jerry	Parrillo	NY
6039	No	Ken	Ramold	NE
6040	No	James	Clark-Rosa	FL
6041	No	Gary	Arford	WA
6042	No	Brown	Bevill	TN
6043	No	Ruth	Lucero	TX

6047	No	Chris	Beemer	KS
6048	No	Roseanna	Bruno	AZ
6049	No	Dialene	Metcalfe	UT
6052	No	Agueda	Vega	CA
6053	No	Stephen	Brandenburg	IA
6054	No	Blaine	Young	UT
6055	No	Marcus	Haynes	CA
6057	No	Chris	Cullinan	VA
6058	No	Camilla	Bradford	CA
6059	No	Stephen	Eyck	OH
6061	No	Shelley	Small	CA
6062	No	Lisa	Rivera	CA
6065	No	Chester	Vidacovoch	LA
6068	No	Stanley	Strope	MO
6070	No	Melinda	Kirklan	CA
6071	No	Stephanie	Celt	WA
6074	No	Bella	Perales	CA
6075	No	Duane	Erickson	NC
6077	No	Lupe	Soto	CA
6080	No	Rachel	Hardy	CA
6082	No	John	Fuller	NC
6083	No	Cheritha	Kennedy	CA
6086	No	Emmett	Scott	LA
6087	No	Filomena	Souza	CA
6089	No	Karla	Bland	WA
6090	No	Sievna	Limpangug	CA
6091	No	Sigrid	Jone	CA
6092	No	Eve	Shoenthal	FL
6094	No	Ann	Layton	MO
6095	No	Ian	Green	CA
6097	No	Roberta	Still	KY
6098	No	Elva	Salazar	CA
6101	No	Lisa	Scott	CA
6102	No	Rudy	Engle	TX
6105	No	Denise	Hickey	ME
6106	No	Todd	Farley	UT
6107	No	Paula	Wilson	FL
6108	No	Sandy	Pitman	CA
6109	No	Carol	Kite	NY
6111	No	Cedar	Neary	WA
6114	No	Martha	Ruiz	CA
6116	No	Sarah	Anderson	TX
6118	No	Sharon	DuChessi	CA
6119	No	Gary	Porter	WA
6122	No	Claudia	Rodriguez	CA
6126	No	Susie	Jacobson	CA
6130	No	George	Sindeband	VA

6133	No	Karen	Harris	WA
6134	No	Joni	Lindberg	MO
6135	No	Melissa	Strong	CA
6139	No	Terry	Walker-Dampier	CA
6141	No	Jacqueline	McClure	OR
6143	No	Florence	Crowson	CA
6148	No	Jack	McGee	OH
6150	No	Jack	Brannan	GA
6152	No	Adrien	Hardy	CA
6153	No	Janis	Chester	DE
6156	No	Orion	Sebastian	TX
6161	No	James	Quintero	TX
6162	No	Patrick	Sefton	IN
6163	No	Peter	Chao	CA
6165	No	Billy	Logue	OK
6167	No	David	Smith	NV
6169	No	Linda	Knapp	AZ
6172	No	Steve & Marge	Wilson	CA
6176	No	Nelda	Gracia	TX
6181	No	Kenneth	Bond	UT
6191	No	Jon	Cook	MO
6193	No	Geri	Hambrock	MI
6197	No	John	Nayadley	FL
6200	No	David	Hack	IN
6202	No	Jonathan	Lavin	IL
6204	No	John	Becker	MN
6206	No	Dale	Price	MD
6208	No	Glenda	Taton-Allen	CO
6210	No	Richard	Ulvestad	MN
6217	No	Daniel	Kloos	CA
6218	No	Katherine	Hempel	WA
6219	No	Barbara	Grabcell-Frank	PA
6220	No	Julie	Warren	TN
6222	No	AM	Newcomer	FL
6224	No	Betty Ann	Durden	GA
6225	No	Andre	Cushing	ME
6226	No	Joe	Simmons	WA
6227	No	Mary	McGarrah	TX
6228	No	James	Nelson	MI
6231	No	Mike	Petrovich	IL
6233	No	Sheli	Moore	TN
6235	No	Robert	Savidge	PA
6237	No	Russell	Harris	LA
6239	No	Barbara	Schwab	UT

6241	No	Harold	Jones	SC
6247	No	Malcolm	Bihl	TX
6249	No	Victoria	Neumeier	WA
6250	No	Kathy	Mundell	NJ
6252	No	Frank	Dawedelt	PA
6253	No	Ardith	Stanley	IL
6254	No	Anne	Edelmann	NJ
6255	No	Pamela	Pasquale	WA
6256	No	Ciara	Hong	VA
6258	No	Katherine	Murray	MA
6259	No	Justin	Hong	VA
6260	No	Gene	Bosacki	WI
6262	No	Don	Veazey	TX
6264	No	Steve	Norquist	VA
6267	No	Sherry	Norquist	VA
6268	No	Patricia	Cole	NJ
6269	No	Gregg	Swank	TX
6270	No	Rollin	Ressegieu	CA
6272	No	William	Perkins	MI
6273	No	Tay	Norquist	VA
6274	No	Linda	Watkins	TX
6275	No	Joseph	Glover	NY
6277	No	Deborah	Boka	CA
5882	No	Chuck	DeVore	TX
5855	Yes	John	Grgurina	CA
5887	Yes	Nigel	Glozier	PA
5888	Yes	Senate & House of Rep	Leachy, Saunders, Walsh	DC
5897	Yes	Melissa Steve	Unger Demarest	OR
5909	Yes	Kathleen	Stoll	WV
5912	Yes	Melissa	Horton	MN
5923	Yes	Rebecca	Sandoval	OR
5934	Yes	Tobias	Read	OR

5940	No	Kim	Thatcher	OR
5955	No	Valeri	Dillion	CA
5964	Yes	Josephine	Kalipeni	
5972	Yes	Angela	Watson	CA
5992	Yes	Brianna	Lierman	CA
6003	Yes	Mike	Garvey	DC
6051	Yes	Carola	Luden	CA
6060	Yes	Dairen	Fang	CA
6064	Yes	Francisco	Icaza	CA
6067	Yes	Hanna	Sememyak	CA
6072	Yes	Julia	Ford	CA
6076	Yes	Juliann	Coulter	CA
6081	Yes	Maria	Molina	CA
6085	Yes	Marie	Hooper	CA
6093	Yes	Grace	Barrios	CA
6100	Yes	Miriam	Alarcon	CA
6110	Yes	Sarita	Gupta	DC
6112	Yes	Ofelia	Vasquez	CA
6131	Yes	Tamara	Nghishakenwa	CA
6136	Yes	John	Chiang	CA
6146	Yes	Amy	Chohen	PA
6154	Yes	Lisa	Winsten	CA
6159	Yes	Rod	Hochman	WA
6171	Yes	Denitra	Pearson	CT
6194	Yes	Luis	Alejo	DC
6198	Yes	Elizabeth	Taylor	
			Hutchenson	
6211	Yes	Julie	Stoss	CA

CMS-2018-0090-2797	No	Ana	Collins	TX
CMS-2018-0090-2798	Yes	Carolyn	Villers	MA
CMS-2018-0090-2799	No	Denice	Brown-Sweeney	TX
CMS-2018-0090-2801	Yes	James	Kruidenier	MA
CMS-2018-0090-2802	No	Earl	Morris	TX
CMS-2018-0090-2804	No	Greg	Wilson	LA
CMS-2018-0090-2805	No	Wendy	Hole	OH
CMS-2018-0090-2806	No	Laraine	Baxter	AZ
CMS-2018-0090-2809	No	Ligia	Hernandez	NJ
CMS-2018-0090-2812	No	Colleen	Giles	MI
CMS-2018-0090-2813	No	Anita	Nolan	PA
CMS-2018-0090-2814	No	Robert	Philippi	TX
CMS-2018-0090-2815	No	Lee	Belanger	ME
CMS-2018-0090-2816	No	Dawn	Neuman	TX
CMS-2018-0090-2817	No	Gary	Alexander	CA
CMS-2018-0090-2820	No	Vlasta	Konecny	MD
CMS-2018-0090-2822	No	Joan	Wheeler	NC
CMS-2018-0090-2823	No	Karen	Santos	CA
CMS-2018-0090-2824	No	Carol	Wight	NM
CMS-2018-0090-2825	No	Eugene	Burger	KS
CMS-2018-0090-2826	No	Pyara	Chauhan	MI
CMS-2018-0090-2827	No	Marian	Vonada	WA
CMS-2018-0090-2828	No	Michael	Jenkinson	TX
CMS-2018-0090-2829	No	Kathe	Gilbert	AZ
CMS-2018-0090-2830	No	Donna	Cohen	MA
CMS-2018-0090-2832	No	Dana	Weikel	CA
CMS-2018-0090-2833	No	Dave	McGuigan	PA
CMS-2018-0090-2834	No	Charles	Taylor	CA
CMS-2018-0090-2836	No	Alexis	Clarke	GA
CMS-2018-0090-2838	No	Ruby	Lewis	NY
CMS-2018-0090-2839	No	John	Darbo	TX
CMS-2018-0090-2840	No	Lester	Larkin	IL
CMS-2018-0090-2841	No	Cleope	Ressler	AZ
CMS-2018-0090-2842	No	Jeanette	Mitchell	CA
CMS-2018-0090-2843	No	Jonathon	Gowan	CA
CMS-2018-0090-2844	No	Davi	Kirby	MI
CMS-2018-0090-2846	No	Helen	Wilson	WI
CMS-2018-0090-2847	No	Taras	Datz	WA
CMS-2018-0090-2848	No	Donald	Robinson	CO
CMS-2018-0090-2849	No	Joy	Henriques	NC
CMS-2018-0090-2850	No	Fred	Williams	TX
CMS-2018-0090-2851	No	Patricia	Wilson	WV
CMS-2018-0090-2852	No	Gcc?	Garlandd	TX
CMS-2018-0090-2853	No	Dawn	Castle	AZ

CMS-2018-0090-2854	No	Terri	Barrett	FL
CMS-2018-0090-2855	No	David	Polister	NM
CMS-2018-0090-2856	No	Harry	Palmer	WA
CMS-2018-0090-2857	No	M	Custy	NM
CMS-2018-0090-2858	No	Vernon	Turner	NC
CMS-2018-0090-2859	No	Jacquelyn	Hill	PA
CMS-2018-0090-2860	No	JoAnn	Perron	NE
CMS-2018-0090-2861	No	Dana	Stupka	TX
CMS-2018-0090-2862	No	Valeda	Day	NC
CMS-2018-0090-2864	No	Beverly	Contakos	TX
CMS-2018-0090-2865	No	Phillip	Noel	MO
CMS-2018-0090-2867	No	Robert	Eisele	WY
CMS-2018-0090-2868	No	Glen	Koths	MI
CMS-2018-0090-2870	No	Roger	Pritchett	AR
CMS-2018-0090-2871	No	Ben	Powell	MI
CMS-2018-0090-2872	No	Steven	Hyde	OR
CMS-2018-0090-2874	No	John	Andresen	FL
CMS-2018-0090-2875	No	Eddie	Compton	TX
CMS-2018-0090-2876	No	Clayton	Baker	WI
CMS-2018-0090-2877	No	Len	McCready	WA
CMS-2018-0090-2880	No	David	Knick	IA
CMS-2018-0090-2881	No	Kirk	Wolak	FL
CMS-2018-0090-2882	No	Jerry	Hughes	TN
CMS-2018-0090-2884	No	Madeline	Jones	GA
CMS-2018-0090-2885	No	Lori	McKean	OH
CMS-2018-0090-2886	No	Kirk	Uchytel	AZ
CMS-2018-0090-2887	No	Anonimo	Anonimo	PR
CMS-2018-0090-2889	Yes	Greg	Devereux	WA
		State Senator		
CMS-2018-0090-2891	Yes	Martin	Looney	CT
CMS-2018-0090-2894	Yes	Barbara	Cissell	KY
CMS-2018-0090-2895	Yes	Anonymous	Anonymous	CA
CMS-2018-0090-2896	Yes	Steven	Kreisberg	DC
CMS-2018-0090-2898	No	Anonymous	Anonymous	PR
CMS-2018-0090-2899	No	Rafael	Alvarez	PR
CMS-2018-0090-2900	Yes	Grover	Norquist	DC
CMS-2018-0090-2901	Yes	Olivia	Grady	DC
		State Senator		
CMS-2018-0090-2902	No	John	Marty	MN
CMS-2018-0090-2903	No	Joyce	Kremnetz	WA
CMS-2018-0090-2905	No	Frankie	Love	MI
CMS-2018-0090-2907	No	Laila	Atallah	MD
CMS-2018-0090-2908	No	David	Margolis	IL

CMS-2018-0090-2909	No	Charles	Wright	MI
CMS-2018-0090-2910	No	Lawrence	Bojarski	CT
CMS-2018-0090-2911	No	Jerry	Tobe	CA
CMS-2018-0090-2912	No	Elisabeth	Genaux	AK
CMS-2018-0090-2913	No	Marie	Snavely	VA
CMS-2018-0090-2914	No	Carol	Hiltner	WA
CMS-2018-0090-2915	No	Richard	Booth	MI
CMS-2018-0090-2917	No	Gina	Bates	OH
CMS-2018-0090-2918	No	Dave	Frank	IA
CMS-2018-0090-2919	No	Virginia	Jastromb	MA
CMS-2018-0090-2921	No	Ronald	Drahos	IN
CMS-2018-0090-2922	No	Catherine	Hunter	MN

CMS-2018-0090-2923	No	Toni	Caldwell Clark	KS
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CMS-2018-0090-2924	No	Javier	Marquez	PR
CMS-2018-0090-2925	No	Aloysius	Wald	OH
CMS-2018-0090-2927	No	Anonymous	Anonymous	WA
CMS-2018-0090-2928	No	Teresa	Mosby	WA
CMS-2018-0090-2929	No	Jim	Wavada	WA
CMS-2018-0090-2930	No	Kristine	Moore	WA
CMS-2018-0090-2931	No	Guy	Perkins	NV
CMS-2018-0090-2933	No	Joyce	Ray	WA
CMS-2018-0090-2934	No	Anonymous	Anonymous	MN
CMS-2018-0090-2935	No	Judy	Arbogast	WA
CMS-2018-0090-2938	No	Richard	Jones	WA
CMS-2018-0090-2939	No	JoAnn	Keenan	WA
CMS-2018-0090-2940	No	David	Westman	WA
CMS-2018-0090-2941	No	A.L.	Steiner	NY

CMS-2018-0090-2942	No	Pedro	Yelton Rossell	PR
CMS-2018-0090-2943	No	Elena	Rumiantseva	WA
CMS-2018-0090-2944	No	David	Laws	WA
CMS-2018-0090-2945	No	Robert	Dries	SD
CMS-2018-0090-2946	No	John	Neubauer	WA
CMS-2018-0090-2948	No	Christopher	Ockwig	MN
CMS-2018-0090-2949	No	John	Butler	WA
CMS-2018-0090-2951	No	Lee	Robinson	CA
CMS-2018-0090-2952	No	Bill	Aston	WA
CMS-2018-0090-2953	No	Edward	Colley	WA
CMS-2018-0090-2955	No	Rosanna	Ramos	PR
CMS-2018-0090-2956	No	Judith	Schwab	WA
			McMorris	
CMS-2018-0090-2957	No	U.S. Rep. Cathy	Rodgers	WA
CMS-2018-0090-2958	No	Cathy	Gunderson	WA
CMS-2018-0090-2960	No	Ken	Loehlein	WA
CMS-2018-0090-2961	No	Anonymous	Anonymous	WA
CMS-2018-0090-2962	No	Gina	Biondolillo	WA
CMS-2018-0090-2963	No	Barbara	Phinney	WA
CMS-2018-0090-2964	No	Tom	Ericksen	MN
CMS-2018-0090-2965	No	Jay	Herzmark	WA
CMS-2018-0090-2968	No	Thomas	Johnson	WA
CMS-2018-0090-2969	No	Nina	French	WA
CMS-2018-0090-2971	No	Garry	Smith	SC
CMS-2018-0090-2972	No	David	Sengel	NC
CMS-2018-0090-2973	No	Anonymous	Anonymous	WA
CMS-2018-0090-2974	No	Paul	Mermin	NC
CMS-2018-0090-2975	No	Arline	Davis	NY
CMS-2018-0090-2976	No	Erline	Towner	NH
CMS-2018-0090-2977	No	Daniel	Therault	WA

CMS-2018-0090-2978	No	Arthur	Waterbury	NV
CMS-2018-0090-2980	No	Raixa Nieves	Surez	PR
CMS-2018-0090-2981	No	Sonialis	Cruz Fontanez	PR
CMS-2018-0090-2983	No	Ismael	Figueroa	PR
CMS-2018-0090-2984	No	Lorena	Butcavage	DE
CMS-2018-0090-2985	No	John	Horvath	OH
CMS-2018-0090-2986	No	Cara	Stanley	OH
CMS-2018-0090-2987	No	Steven	Gross	AZ
CMS-2018-0090-2988	No	Susan	Dress	OH
CMS-2018-0090-2989	No	Robert	Anderson	PA
CMS-2018-0090-2990	No	Carolyn	Neary	WA

CMS-2018-0090-2991	No	Josue	Castresana	PR
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CMS-2018-0090-2993	No	Julia	Goren	NY
CMS-2018-0090-2994	No	Anonymous	Anonymous	FL
CMS-2018-0090-2995	No	Feryne	Wooldridge	WA
CMS-2018-0090-2996	No	Edwin	Soto	PR
CMS-2018-0090-2999	No	Claudia	Bainbridge	WA
CMS-2018-0090-3000	No	Hortencia	Morales	CA
CMS-2018-0090-3001	No	Will	Swaim	CA
CMS-2018-0090-3002	No	Anonymous	Anonymous	MI
CMS-2018-0090-3003	No	Floyd	Anonymous	WA
CMS-2018-0090-3004	No	Anonymous	Anonymous	MN
CMS-2018-0090-3005	No	Susan	Wickham	IA
CMS-2018-0090-3006	No	Lynda	Wilson	WA
CMS-2018-0090-3007	No	Daniel	Gilmartin	FL
CMS-2018-0090-3009	Yes	Troy	Christensen	WA
CMS-2018-0090-3012	Yes	Rv. Dr. John Jr.	Selders	CT
CMS-2018-0090-3015	Yes	Coston	Plummer	IL
CMS-2018-0090-3016	No	Seth	Hemond	WA
CMS-2018-0090-3017	Yes	Elizabeth	Jordan	IL
CMS-2018-0090-3018	Yes	Felicia	Jackson	IL
CMS-2018-0090-3019	Yes	Vanda	Talkington	IL
CMS-2018-0090-3020	No	Ian	Hansen	WA
CMS-2018-0090-3021	Yes	Virginia	Grant	IL
CMS-2018-0090-3022	Yes	Katherine	Jones-Newton	CT
CMS-2018-0090-3023	Yes	Jay	Spika	MN
CMS-2018-0090-3024	No	Joseph	Kendo	WA
CMS-2018-0090-3025	No	Robert	Norton	CA
CMS-2018-0090-3026	Yes	Chris	Norton	CT

CMS-2018-0090-3027	Yes	Lauren	Thompson	MN
CMS-2018-0090-3029	Yes	Dave	Hill	CT
CMS-2018-0090-3031	No	Darrell	Jenkins	WA
CMS-2018-0090-3033	Yes	Elaine	Brown	CT
CMS-2018-0090-3034	Yes	Cathy	Gillman	MN
CMS-2018-0090-3035	Yes	Sarah	Banashak	MN
CMS-2018-0090-3036	Yes	Jamal	Curry	CT
CMS-2018-0090-3039	Yes	Karen "Lynn"	Holman	MT
CMS-2018-0090-3040	Yes	James	Franklin	CT
CMS-2018-0090-3041	Yes	Clara	Nakumbe	MN
CMS-2018-0090-3042	No	Mary	Murphy	WA
CMS-2018-0090-3043	Yes	Agustina	Cardenas	WA
CMS-2018-0090-3044	Yes	Anna	Rudova	WA
CMS-2018-0090-3045	Yes	Berta	Alvarado	WA
CMS-2018-0090-3046	Yes	Dawn	Lindberg	MN
CMS-2018-0090-3047	Yes	Darryl	Johnson	WA
CMS-2018-0090-3048	No	Loren	Jenkins	WA
CMS-2018-0090-3049	Yes	Gayla	Young	MN
CMS-2018-0090-3050	Yes	Debbra	Maul	WA
CMS-2018-0090-3051	No	Karen	Strickland	WA
CMS-2018-0090-3052	Yes	Kara	O'Dwyer	CT
CMS-2018-0090-3053	Yes	Ed	Solseng	WA
CMS-2018-0090-3054	Yes	Janie	Hauff	WA
CMS-2018-0090-3055	Yes	Karlene	Whonder	CT
CMS-2018-0090-3056	Yes	Jacquelyn	Kelly	MN
CMS-2018-0090-3057	Yes	Linda	Lee	WA
CMS-2018-0090-3058	Yes	Manuel	Brito	WA
CMS-2018-0090-3059	Yes	LaTanya	Hughes	MN
CMS-2018-0090-3060	No	Richard	Oram	IL
CMS-2018-0090-3061	Yes	Margaret	Singh	WA
CMS-2018-0090-3062	Yes	Ken	Jacobs	CA
CMS-2018-0090-3063	Yes	Kay	Wright	CT
CMS-2018-0090-3064	Yes	Melissa	Ringer	WA
CMS-2018-0090-3065	Yes	Delores	Flynn	MN
CMS-2018-0090-3066	Yes	Monique	Taylor-Swan	WA
CMS-2018-0090-3067	Yes	Lucia	Nuez	CT
CMS-2018-0090-3068	Yes	Pauline	Tischman	MN
CMS-2018-0090-3069	Yes	Nelly	Prieto	WA
CMS-2018-0090-3070	Yes	Pam	Hansen	WA
CMS-2018-0090-3071	Yes	Robin	Pikala	MN
CMS-2018-0090-3072	Yes	Michelle	Hart	CT
CMS-2018-0090-3073	No	Anonymous	Anonymous	MO
CMS-2018-0090-3074	Yes	Rhonda	Paul	WA
CMS-2018-0090-3075	Yes	Shazia	Anwar	WA
CMS-2018-0090-3076	Yes	Rich	Casolla	CT
CMS-2018-0090-3077	Yes	Shelley	Hughes	WA

CMS-2018-0090-3078	Yes	Sue	Jaggers	WA
CMS-2018-0090-3079	Yes	Terrell	Williams	CT
CMS-2018-0090-3080	Yes	Sun	Benjamin	WA
CMS-2018-0090-3081	Yes	Susie	Young	WA
CMS-2018-0090-3082	Yes	Sylvia	Liang	WA
CMS-2018-0090-3083	Yes	Tanika	Aden	WA
CMS-2018-0090-3084	Yes	Valerie	Anderson-Webb	WA
CMS-2018-0090-3085	Yes	Vera	Kandrashuk	WA
CMS-2018-0090-3086	Yes	Ariane	Martin	MA
CMS-2018-0090-3087	No	Kim	Sellon	NJ
CMS-2018-0090-3088	No	Frank	Coleman	NY
CMS-2018-0090-3089	Yes	Clemencia	Hernandez	MA
CMS-2018-0090-3090	Yes	Eleni	Syrpis	MA
CMS-2018-0090-3091	Yes	Iris	Gonzalez	MA
CMS-2018-0090-3092	Yes	Janice	Guzman	MA
CMS-2018-0090-3093	No	Eleesha	Hruza	AK
CMS-2018-0090-3094	Yes	Karamba	Diallo	MA
CMS-2018-0090-3095	No	James	To	WA
CMS-2018-0090-3096	Yes	Kilra	Hylton	MA
CMS-2018-0090-3097	No	Robyn	Wagoner	WA
CMS-2018-0090-3098	Yes	Kirsis	Pimentel	MA
CMS-2018-0090-3099	Yes	Lesbia	Vidot	MA
CMS-2018-0090-3100	No	Shireen	McSpadden	CA
CMS-2018-0090-3101	Yes	Lizete	Rosa	MA
CMS-2018-0090-3102	Yes	Louis	Wagner	MA
CMS-2018-0090-3103	Yes	Luisa	Cedano	MA
CMS-2018-0090-3104	Yes	Marina	Hennessey	MA
CMS-2018-0090-3105	Yes	Michelle	Guzman	MA
CMS-2018-0090-3106	Yes	Minerva	Lebron	MA
CMS-2018-0090-3107	Yes	Stephanie	Dennis	MA
CMS-2018-0090-3108	No	Patrick	Diehl	AZ
CMS-2018-0090-3109	No	Lydia	Barlow	WA
CMS-2018-0090-3110	No	Amerin	Aborjaily	VT
CMS-2018-0090-3111	No	L	C	MN
CMS-2018-0090-3112	Yes	James	Bhandary-Alexander	CT
CMS-2018-0090-3113	No	Dora-Faye	Hendricks	WA
CMS-2018-0090-3116	No	Janice	Lawrence	WA
CMS-2018-0090-3117	No	Anonymous	Anonymous	PR
CMS-2018-0090-3118	Yes	Matthew	Glans	IL
CMS-2018-0090-3119	Yes	Linda	Gorman	CO
CMS-2018-0090-3121	Yes	Karen	Keiser	WA
CMS-2018-0090-3123	No	Senator Jan	Angel	WA
CMS-2018-0090-3124	No	Lennon	Bronsema	WA
CMS-2018-0090-3125	No	David	Westberg	WA
CMS-2018-0090-3126	No	Merissa	Clyde	WA
CMS-2018-0090-3127	No	Karen	Gervasoni	ME

CMS-2018-0090-3149	No	Carlos	Acosta	PR
CMS-2018-0090-3198	No	Karen	Anonymous	AZ
CMS-2018-0090-3217	No	Huong	Luong	OR
CMS-2018-0090-3249	No	Virgene	Link-New	WA
CMS-2018-0090-3542	No	Anna	Harvey	CA
CMS-2018-0090-3569	No	Elyette	Weinstein	WA
CMS-2018-0090-3739	No	Mary	Chase	CA
CMS-2018-0090-3762	No	Louise	Mehler	CA
CMS-2018-0090-3824	No	Rafael	Gonzalez	CA
CMS-2018-0090-3923	No	Candace	Howes	CT
CMS-2018-0090-3951	No	Tim	Katz	CA
CMS-2018-0090-3970	No	Sarah	Lamnin	CA
CMS-2018-0090-4012	No	Jan	Phallen-Fike	CA
CMS-2018-0090-4221	No	Barry	Gerst	NM
CMS-2018-0090-4275	No	Rasa	Moss	CA
CMS-2018-0090-4544	No	Cristela	Escareno	CA
CMS-2018-0090-4621	No	Anne	Kuzma	PA
CMS-2018-0090-4649	No	Andrea	Karafilis	CA
CMS-2018-0090-4676	No	Anonymous	Anonymous	CA
CMS-2018-0090-4760	No	Jeff	Bertain	CA
CMS-2018-0090-4784	No	Trey	Kovacs	DC
CMS-2018-0090-4789	No	Jason	Schulman	NY
CMS-2018-0090-4790	No	Margaret	Shelleda	CA
CMS-2018-0090-4792	No	Deryl	McCarty	WA
CMS-2018-0090-4796	No	Richard	Hempel	WA
CMS-2018-0090-4798	Yes	Lisa	Hempel	WA
CMS-2018-0090-4808	No	Susana	Mendoza	IL

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Freedom Works Foundation		1
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Western Center on Law & Poverty

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CA Department of Social Services

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NY Dept of Consumer Affairs

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PA Dept of the Auditor General

	No	1
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Policy Committee of the Washington Association of Area Agencies on Aging

No 1
No 1
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CA Attorney General/CA State Controller

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No 1

N/A

No 1
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N/A

No 1

N/A

No 1

N/A

No 1
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N/A

No 1

Pacific Legal Foundation

No 2

N/A

No 1

Oregon State Council of Retired Citizens, Oregon Consumer League, and
United Seniors of Oregon

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N/A	No	1
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MNPCA	Yes	1
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Beacon Center of Tennessee	No	1
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Center for American Progress Action Fund

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Service Employees International Union Local 1199 United Healthcare Workers East	No	1
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Service Employees International Union, Healthcare Illinois, Indiana,
Missouri, and Kansas

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Access Living

No

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SEIU775	No	1
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AFSCME/UDW Local 3930	No	1
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National Consumer Voice for Quality Long-Term Care	No	2
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IHSS of Riverside County	No	1
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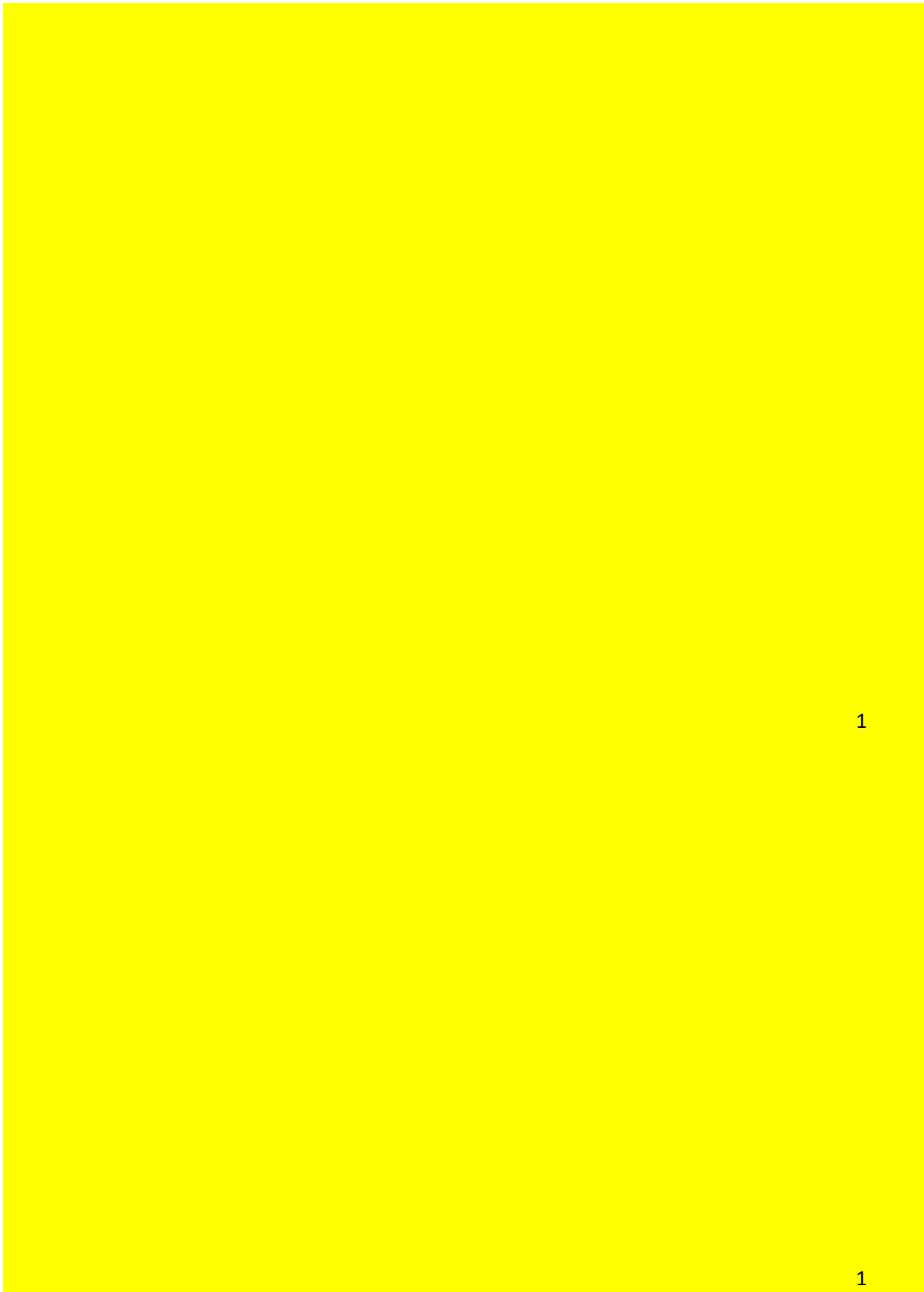
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National Right to Work Legal Defense Foundation	No		1
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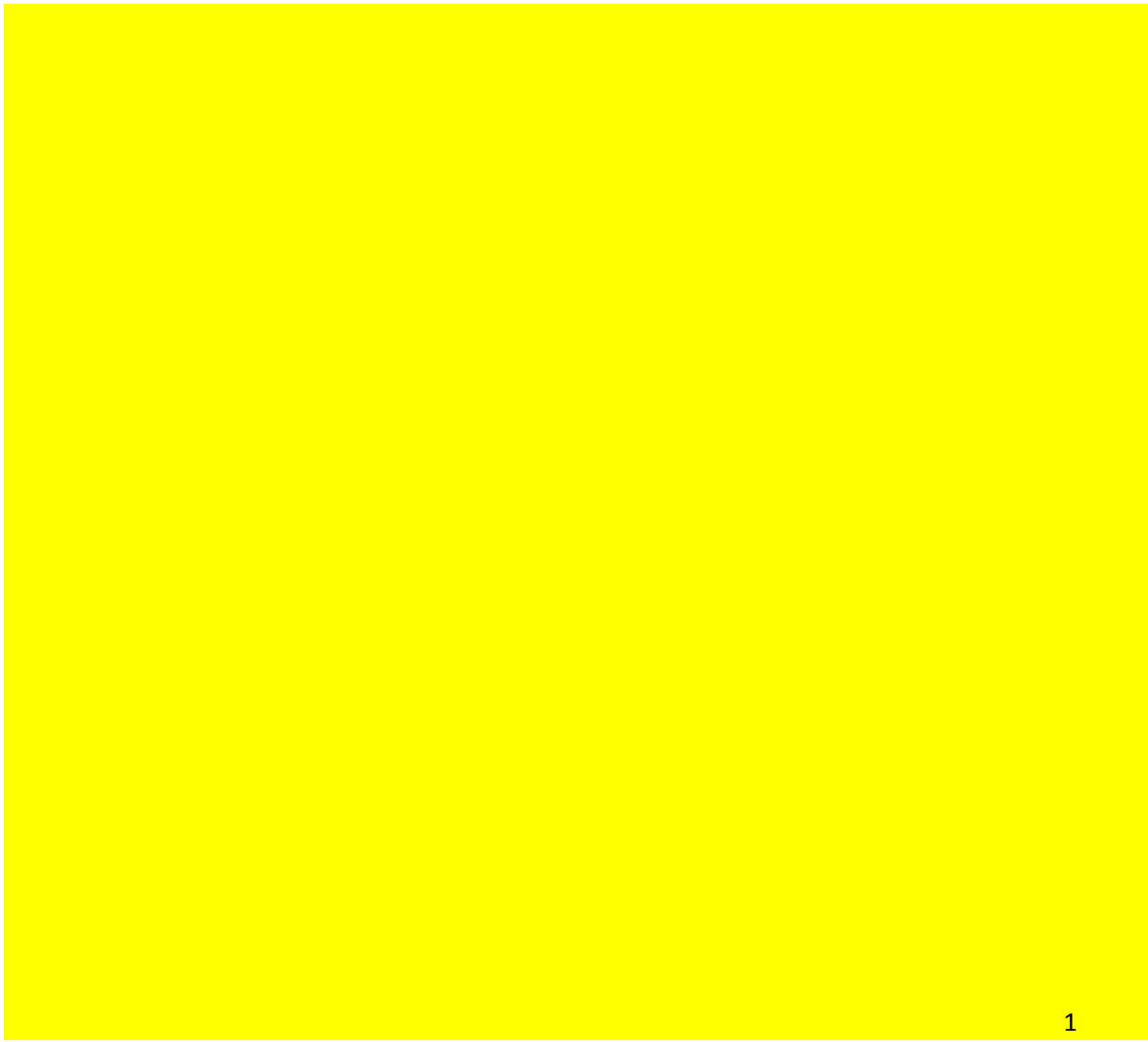
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Alliance of Community Health Plans (ACHP)	No	1
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The Commonwealth Foundation	No	1
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N/A	No	1
Service Employees Internation Union	No	1
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Pioneer Institute	No		1

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The Economic Policy Institute (EPI)	No		1
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National Federation of Independent Business	N	1
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Sanlazarger medical	N	1
Consolidated Radiology Complex, CSP	N	1
SIGNET PUERTO RICO, LLP	N	1
N/A	N	1
N/A	N	1
Colegio de Mdicos Cirujanos de Puerto Rico	N	1
N/A	N	1
N/A	N	1
Oficina Dra. Carmen D Irizarry	N	1
N/A	N	1
Dr Jose Badillo Hernandez Office, Hostos Medical service, Solidarity	N	1
MSO, Procare health alliance	N	1
N/A	N	1
Freedom Works	N	1
N/A	Y	1
N/A	Y	1
Congress of California Seniors	N	1
Public Authority by Sourcewise	N	1
N/A	N	1
N/A	Y	1
Elder Law/Care Communications, Inc.	N	1
Ethan Allen Institute	N	1
N/A	N	1
N/A	N	1

Senior and Disability Action	Y	1
N/A	N	1
N/A	N	1
Vermonters for Health Care Freedom	N	1
COLEGIO DE MEDICOS Y CIRUJANOS DE PUERTO RICO	N	1
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IHHS Public Authority	N	1
N/A	N	1
EAI	N	1

UCLA	N	1
University of Iowa	N	1
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National Employment Law Project
 Action NC
 AFL-CIO
 Amara Legal Center
 American Civil Liberties Union
 American Federation of State, County and Municipal Employees
 (AFSCME)
 Americans for Democratic Action (ADA)
 Arkansas Community Organizations
 Asian Pacific American Labor Alliance (APALA)
 Autistic Self Advocacy Network
 Battle Born Progress
 California In-Home Supportive Services Consumer Alliance
 Caring Across Generations
 Center for American Progress
 Center for Community Change Action
 Center for Law and Social Policy (CLASP)
 Center for Medicare Advocacy
 Center for Popular Democracy
 Center for Public Representation
 Citizen Action of the Hudson Valley
 Citizen Action/Illinois
 Congress of California Seniors
 Disability Rights California
 Economic Opportunity Institute
 Equal Rights Advocates
 Faith in Indiana
 Faith in Public Life
 Hand in Hand: The Domestic Employers Network

N 1

N/A N 1

N/A N 1

MN PCA Campaign	N	1
N/A	N	1
Alameda Alliance for Health (managed care health plan in CA)	N	1
N/A	N	1
Union member (Service Employees International Union (SEIU) in IL, IN, MO, and KS)	N	1
State of California Office of the Attorney General	N	1
Premier Anesthesia Consultants, PSC	N	1
College of Physicians and Surgeons	N	1
N/A	N	1
Labor and Working-Class History Association (LAWCHA)	N	1
N/A	N	1
N/A	N	1
N/A	N	1

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Show Me Institute	N	1
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AFSCME	N	1
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Union Member	N	1
N/A	N	1

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Hand in Hand: The Domestic Employers Network	N	1
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optouttoday.com	N	1
N/A	N	1

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Union Member (SEIU)	N	1
N/A	N	1
N/A	N	1

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COSSMA	N	1
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MNPAC	N	1
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SIMNSA Health Plan	N	1
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American Legislative Exchange Council (ALEC)

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Dental Health Services

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N/A

N 1

ALEC Action

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Plattee Institute	N	1
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US Senate	N	1
Colegio de mdicos	N	1
N/A	N	1

Rio Grande Foundation	N	1
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Americans for Prosperity	N	1
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Survival Coalition	N	1
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MNPCA Attorney (Seaton, Peters & Revnew, P.A.)

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Opportunity Solutions Project

N

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Washington State Senate

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Washington State Senate	N	1
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N/A	N	1
N/A	N	1
N/A	N	1
Alaska Policy Forum	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
University of California, Santa Barbara	N	1
Freedom Caucus	N	1
Alabama Policy Institute	N	1
N/A	N	1
N/A	N	1

Washington State Senate	N	1
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N/A	N	1
National Employment Law Project		
Action NC		
AFL-CIO		
Amara Legal Center		
American Civil Liberties Union		
American Federation of State, County and Municipal Employees (AFSCME)		
Americans for Democratic Action (ADA)		
Arkansas Community Organizations		
Asian Pacific American Labor Alliance (APALA)		
Autistic Self Advocacy Network		
Battle Born Progress		
California In-Home Supportive Services Consumer Alliance		
Caring Across Generations		
Center for American Progress		
Center for Community Change Action		
Center for Law and Social Policy (CLASP)		
Center for Medicare Advocacy		
Center for Popular Democracy		
Center for Public Representation		
Citizen Action of the Hudson Valley		
Citizen Action/Illinois		
Congress of California Seniors		
Disability Rights California		
Economic Opportunity Institute		
Equal Rights Advocates		
Faith in Indiana		
Faith in Public Life		
Hand in Hand: The Domestic Employers Network	N	1
N/A	N	1
N/A	N	1
National Federation of Independent Business	N	1
Beneficiary of Home Care Services	N	1
N/A	N	1

N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
United States Congress	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1

Center of the American Experiment	N	1
SEUI 755	N	1
SEUI 755	N	1
Retired State Senator	N	1
N/A	N	1
N/A	N	1
N/A	N	1
SEUI 755	N	1
SEUI 755	N	1
SEUI 755	N	1
SEUI 755	N	1
N/A	N	1
N/A	N	1
SEUI 755	N	1

CALIFORNIA COLLABORATIVE FOR LONG-TERM SERVICES & SUPPORTS	N	1
SEUI 755	N	1

Massachusetts House of Representatives

N/A

N/A

N

N

N

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County of Santa Clara

N/A

N/A

N/A

N/A

N/A

N/A

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[illegible]

John K. MacIver Institute

N/A	Y	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
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N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
Provider	Y	1
Provider	Y	1
N/A	N	1
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Provider	N	1
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Provider	N	1
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N/A	N	1

AgeOptions	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
Maine Senate	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1

Oregon State Senator	N	1
Provider	N	1
Caring Across Generations	N	1
N/A	N	1
Local Health Plans of California	N	1
American Civil Liberties Union	N	2
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
N/A	N	1
Jobs with Justice	N	1
N/A	N	1
N/A	N	1
CA State Treasurer	N	1
Hand in Hand	N	1
The Trust	N	1
Providence St. Joseph Health	N	1
N/A	N	1
Monterey County Board of Supervisors	N	2
National Health Law Program	N	2
Kaiser Permanente	N	1

-	No	1
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ORAU	No	1
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PCA	No	1

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-	No	1
Caribbean Radiation Oncology Center	No	1
Caribbean Radiation Oncology Center	No	1
-	No	1
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-	No	1
WellCare Health Plans	No	1
-	No	1
Colegio de medicos	No	1
-	No	1
-	No	1
California Policy Center	No	1
-	No	1
-	No	1
Minnesota Senate	No	1
-	No	1
Washington Senate	No	1
-	No	1
Korean Women's Association	No	1
-	No	1
-	No	1
SEIU Healthcare NW Training Partnership	No	1
-	No	1
-	No	1
-	No	1
-	No	1
-	No	1
-	No	1
Washington State Labor Council AFL-CIO	No	1

-	No	1
-	No	1

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-	No	1
-	No	1
-	No	1
Connecticut College	No	1
-	No	1
-	No	1
-	No	1
Rotary	No	1
-	No	1
-	No	1
-	No	1
-	No	1
County of Alameda, CA	No	1
-	No	1
Competitive Enterprise Institute	No	1
-	No	1
-	No	1
-	No	1
-	No	1
-	No	1
-	No	1

Duplicate?	In Support (1 = Yes) (0 =No)	In Opposition (10=0Yes) (00=No)	Impact on Self-Direct Service Models	Special Considerations (if applicable)
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	0	0	0	Comment Replied: NO
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	0	1	0	-
No	1	0	0	-
No	1	0	0	Workers have the right to designate payments from their paychecks, for IRAs, and Union dues, and any number of other reasons - it's THEIR money, not their employers.
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	Get union out of government.
No	1	0	0	Stop the insanity ASAP!!!
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	0	0	0	Right to work in all states!
No	1	0	0	-

No	0	0	0	No. Blocking these direct Medicaid payments means the workers especially those who dont work in a single, centralized office, or dont have a credit card or a bank account are far less likely to pay dues, diminishing the unions potential influence. This is an anti-union measure.
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	Please be fair with the people's money.
	1	0		
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	0	1	0	-
No	0	1	0	Blocking these direct Medicaid payments penalizes the workers especially those who dont work in a single, centralized office, or dont have a credit card or a bank account and are an attack on their ability to unionize.
				It should be obvious that the government should not force people to provide support to ideas they abhor.
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	-
No	1	0	0	When will the corruption END?

No	1	0	0
No	1	0	0
No	1	0	0
No	1	0	0
No	1	0	0
No	1	0	0
No	1	0	0
No	1	0	0
No	1	0	0
No	1	0	0
No	1	0	0

Unions might have been needed in the 1930s, but not now. Unions are like Socialism or Communism; The take away from Free enterprise. I was 'union' once, and I got the same pay check as the guy who goofed off all day. I don't like 'sharing the wealth', that I worked for and others didn't. Unions COST TOO MUCH and don't profit anyone except Unions. They also support the political party that I don't. WE DON'T NEED UNIONS!

No	1	0	0
No	1	0	0

Caregivers who attend to personal needs of handicapped and elderly people are much needed. I know because I care for my elderly mother in her own home. Without me she would need to be in a nursing home. Caregivers should not be forced to pay union dues. If so then the requirement amounts to a financial burden on the caregiver and those they care for.

No	1	0	0
No	0	1	0
No	1	0	0
No	1	0	0
No	0	1	0
No	1	0	0
No	1	0	0
No	1	0	0
No	1	0	0

Please, stop taking union dues from home health caregivers who do not belong to an union. These poorly paid and necessary workers need every penny of their paycheck. This practice amounts to stealing others money.

I am asking you to support Proposal # CMS 2419

P. I am VERY Thankful that we can have our 24 hr handicap son in our home and be able to be paid through Medicaid services. When SEIU775 was able to take 3.2% out of every pay check, it was a huge burden in our single family income home. Last year after pushing through the deception and flat out lies from the union, I opted out. I NEVER was a member of any union or signed anything to support a union. As a Parent Provider the union has never once in 14 + yrs. asked me what would help ease the pressure in our home. I have felt used by this union while the hate words now call me a freeloader and try to guilt me into supporting them again. My experience is I'm just a number that had been used by SEIU775 for what and who they chose to support politically for their own personal gain. Medicaid services should Never have been skimmed out of workers pay checks to support a union! If workers (and tax payers) feel a Public Sector Union benefits them, then let them pay for it out of their home budget.
 Now what has happened in WA State (don't know about other states) this year our legislation passed SB-6199. My voice was never acknowledged in the legislative process by the people who voted for it, not even Gov. Jay Inslee as he signed it into law. My understanding is SB-6199 will force me

No	1	0	0
No	1	0	0
No	1	0	0
No	1	0	0
No	1	0	0
No	1	0	0
No	1	0	0
No	1	0	0

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Despite the clear prohibition in Section 32, Minnesota, as a result of the Obama administration exemption, has diverted an estimated \$8.5M Medicaid dollars from their intended purpose paying for care for the disabled to subsidize political activities conducted by SEIU Healthcare Minnesota, as well as training used for union recruitment and indoctrination. While assignments of union dues from payments to home health care providers have been both voluntary and involuntary in Minnesota, the voluntariness of an assignment is irrelevant under Section 32, which prohibits even voluntary assignments, except to government agencies or by court order.

The Department of Human Services, which implements Minnesotas Medicaid program, lacks statutory authority to appropriate and, as has been made clear above, federal law prohibits the described appropriation. Still, this profound misuse of federal funds continues. As such, the final rule or an additional regulation must make clear that Section 32 prohibits the diversion of Medicaid payments to unions and their affiliates, and that only assignments to government agencies or by court orders are permitted.

Respectfully Submitted,

Representative Matt

No	1	0	0	Dean Chair Health And Human Services
No	1	0	0	-
No	0	0	0	Blank comment
				Out of Scope: : I need a loan. I can pay payment
No	0	0	0	on and all my benefits
No	0	0	0	Blank comment
No	1	0	0	-
No	0	0	0	Blank comment
No	1	0	0	-
No	1	0	0	Blank comment
No	1	0	0	Blank comment
	1	0	0	Had union deus involuntarily take out of her pay
	1	0	0	check.
	0	0	0	
	1	0	0	
	1	0	0	
	1	0	0	

0

			CA believes the prposed rule will unnecessarily increase administrative burden and cost for consumers.
0	1	0	
1	0	0	
1	0	0	
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1	0	0	
1	0	0	
1	0	0	
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1	0	0	
1	0	0	

Help to clean up Congress. These "perks" by Congress and their large supporters are simply not fair. They steal money from those who need it most

0	0	0
1	0	0
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1	0	0
1	0	0

- the proposed rule undermine the financial and emploment security of thousands of home care workers.
- took issue with the lack of analysis concerning the economic significance of the rule
- proposed rule will negatively impact access to services

0	1	0
1	0	0
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1	0	0
0	0	0
1	0	0
1	0	0

Please fix our healtcare, It's bad for America.

			PA Dept of the Auditor General: Questioned the validity of the \$8 million in the footnote of the notice. Also noted that PA does not required mandated deductions of union dues
0	1	0	
1	0	0	
1	0	0	
1	0	0	Iowa State Representative
1	0	0	
1	0	0	
1	0	0	
1	0	0	

1	0	0	
1	0	0	
1	0	0	MO State Representative
1	0	0	
1	0	0	
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1	0	0	
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1	0	0	

Washington state has one of the nation's oldest models for participant self-direction --- its origins dating back to the 1980's. We've proven that people with significant levels of disability can select, hire, direct, and, if necessary, dismiss the people who provide the most personal type of care that allows them to stay at home with health and safety. Largely because of its program of self direction, Washington state's long-term care system ranks first nationally in quality, while remaining less costly than in 37 other states. Providing financial intermediary support for those who self-direct has been an essential part of Washington's success. Given the challenges presented by a workforce scattered in tens of thousands of homes throughout the state, since the inception of its consumer directed program Washington state has essentially operated directly as the fiscal intermediary on behalf of client-employers. On the client's behalf Washington directly pays worker wages and related costs, including worker training, healthcare, taxes, retirement, worker's compensation, and industrial insurance. The 2012 regulatory clarification was a welcome acknowledgement of what had already been happening in Washington for decades and how necessary it is to take the administrative burdens off people with disabilities to allow them to focus

	0	1	0	
	1	0	0	
	0	0		
	0	0		- This rule would excess HHS's authority and intrudes upon state sovereignty.
	1	0	0	- raises federalism concerns and violates 10 amendment rights
No	0	1	No	Disproportionately impacts women and people of color.
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	Undermines unions
No	0	1	No	Undermines unions
No	0	1	No	Undermines unions
	0	0		Will lose insurance coverage
No	0	1	No	Undermines unions
No	1	0	No	Violates First Amendment
No	1	0	No	Illegally taking dues from pay

No	0	1	No	Reduces number of people receiving LTSS in the community.
	0	0		Undermines unions
No	0	1	No	Undermines unions
	0	0		Will lose insurance coverage
	0	0		Disproportionately impacts women and people of color.
No	1	0	No	Anti-union
				Tax dollars should not be used to collect union dues
No	1	0	No	Investigate unauthorized automatic deductions for unions dues
				Investigate unauthorized automatic deductions for unions dues
No	1	0	No	Investigate unauthorized automatic deductions for unions dues
No	1	0	No	N/A
				Investigate unauthorized automatic deductions for unions dues
No	1	0	No	CMS should investigate unauthorized deductions for paid time off
	0	0		Investigate unauthorized automatic deductions for unions dues
No	1	0	No	Investigate unauthorized automatic deductions for unions dues
				Investigate unauthorized automatic deductions for unions dues
No	1	0	No	Anti-union
No	1	0	No	Medicaid funds should not be diverted for unions
				Investigate unauthorized automatic deductions for unions dues
No	1	0	No	Investigate unauthorized automatic deductions for unions dues
No	1	0	No	Help address SEIU unfair practices
No	0	1	No	Administratively burdensome if Rule is changed
				Investigate unauthorized automatic deductions for unions dues
No	1	0	No	Anti-union
No	0	1	No	Administratively burdensome if Rule is changed
	0	0		Hurts those who don't have bank accounts
No	0	1	No	Pro-union
	0	0		30 day comment period unfair
No	1	0	No	Anti-union
No	0	1	No	Pro-union

	0	0		Afraid will lose insurance coverage
	0	0		Don't change automatic deduction
				Investigate unauthorized automatic deductions
No	1	0	No	for unions dues
No	0	1	No	Administratively burdensome if Rule is changed
	0	0		Afraid will lose insurance coverage
	0	0		Don't change automatic deduction
No	0	1	No	Administratively burdensome if Rule is changed
	0	0		Don't change automatic deduction
	0	0		Afraid will lose insurance coverage
				Stop unauthorized automatic deductions for
No	1	0	No	union dues
No	0	1	No	Pro-union
	0	0		First amendment right to support unions
				Stop unauthorized automatic deductions for
No	1	0	No	union dues
No	0	1	No	Pro-union
	0	0		30 day comment period unfair
No	0	1	Yes	Undermines consumer directed care system
	0	0		May reduce qualified provider numbers
				Providers should have choice of voluntary
	0	0		deductions
No	0	1	No	Reduces state flexibility
No	0	1	No	Pro-union
	0	0		First amendment right to support unions
No	0	1	No	Administratively burdensome if Rule is changed
	0	0		Pro-union
	0	0		Afraid will lose insurance coverage
No	0	1	No	Administratively burdensome if Rule is changed
	0	0		Pro-union
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	Administratively burdensome if Rule is changed
	0	0		Pro-union
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		First amendment right to support unions
	0	0		Afraid will lose insurance coverage
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
No	1	0	No	N/A
No	0	1	No	Violates civil rights
	0	0		Afraid will lose insurance coverage
	0	0		Administratively burdensome if Rule is changed
	0	0		Pro-union

No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		Afraid will lose insurance coverage
No	0	1	No	Pro-union
	0	0		First amendment right to support unions
				Disproportionately impacts women and people of color.
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		Afraid will lose insurance coverage
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		Afraid will lose insurance coverage
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		Afraid will lose insurance coverage
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		Afraid will lose insurance coverage
				Disproportionately impacts women and people of color.
	0	0		First amendment right to support unions
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		Afraid will lose insurance coverage
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	Administratively burdensome if Rule is changed
	0	0		Afraid will lose insurance coverage
	0	0		First amendment right to support unions
No	0	1	No	Administratively burdensome if Rule is changed
	0	0		Afraid will lose insurance coverage
	0	0		First amendment right to support unions
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		Afraid will lose insurance coverage
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		Afraid will lose insurance coverage
	0	0		First amendment right to support unions

No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		Afraid will lose insurance coverage
	0	0		First amendment right to support unions
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		First amendment right to support unions
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		First amendment right to support unions
No	0	1	No	Pro-union
	0	0		First amendment right to support unions
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		First amendment right to support unions
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	First amendment right to support unions
	0	0		Pro-union
No	1	0	No	Anti-union
No	0	1	No	Administratively burdensome if Rule is changed
	0	0		First amendment right to support unions
	0	0		Pro-union
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		Providers should have choice of voluntary
No	1	0	No	deductions
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	Pro-union
	0	0		First amendment right to support unions
	0	0		30 day comment period unfair
No	0	1	No	Pro-union
	0	0		First amendment right to support unions
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	Pro-union
	0	0		First amendment right to support unions
No	0	1	No	Pro-union

	0	0		Disproportionately impacts women and people of color.
	0	0		Administratively burdensome if Rule is changed
	0	0		Afraid will lose insurance coverage
	0	0		Government shouldn't tell us how to spend our own money
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		Government shouldn't tell us how to spend our own money
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		First amendment right to support unions
	0	0		May reduce the number of people receiving LTSS in the community
No	0	1	No	Pro-union
	0	0		Undermines unions
No	0	1	No	30 day comment period unfair
	0	0		Pro-union
	0	0		Providers should have choice of voluntary deductions
	0	0		Undermines unions
No	0	1	No	Providers should have choice of voluntary deductions
	0	0		Administratively burdensome if Rule is changed
	0	0		First amendment right to support unions
	0	0		Pro-union
	0	0		Afraid will lose insurance coverage
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		Undermines unions
No	0	1	No	Pro-union
	0	0		Undermines unions
	0	0		Administratively burdensome if Rule is changed
	0	0		Government shouldn't tell us how to spend our own money
No	0	1	No	Administratively burdensome if Rule is changed
	0	0		Government shouldn't tell us how to spend our own money
	0	0		Pro-union
No	0	1	No	Pro-union
	0	0		Violates civil rights
	0	0		Government shouldn't tell us how to spend our own money
No	0	1	No	Government shouldn't tell us how to spend our own money
	0	0		First amendment right to support unions

	0	0		Afraid will lose insurance coverage
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	First amendment right to support unions
	0	0		Pro-union
				Government shouldn't tell us how to spend our
	0	0		own money
	0	0		Afraid will lose insurance coverage
No	0	1	No	First amendment right to support unions
	0	0		Pro-union
				Government shouldn't tell us how to spend our
	0	0		own money
	0	0		Don't change automatic deduction
No	0	1	No	First amendment right to support unions
	0	0		Pro-union
				Government shouldn't tell us how to spend our
	0	0		own money
	0	0		Don't change automatic deduction
No	1	0	No	N/A
No	0	1	No	Afraid will lose insurance coverage
	0	0		Pro-union
	0	0		Don't change automatic deduction
No	0	1	No	Pro-union
				Government shouldn't tell us how to spend our
	0	0		own money
	0	0		Undermines unions
	0	0		Administratively burdensome if Rule is changed
				Government shouldn't tell us how to spend our
No	0	1	No	own money
	0	0		Pro-union
	0	0		Don't change automatic deduction
				Government shouldn't tell us how to spend our
No	0	1	No	own money
	0	0		First amendment right to support unions
	0	0		Administratively burdensome if Rule is changed
	0	0		Pro-union
No	0	1	No	Pro-union
	0	0		Afraid will lose insurance coverage
				Government shouldn't tell us how to spend our
	0	0		own money
	0	0		Administratively burdensome if Rule is changed
				Government shouldn't tell us how to spend our
No	0	1	No	own money
	0	0		Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		Undermines unions
	0	0		Hurts those who don't have bank accounts
No	0	1	No	Pro-union

	0	0		Administratively burdensome if Rule is changed
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		Afraid will lose insurance coverage
				Government shouldn't tell us how to spend our own money
No	0	1	No	Pro-union
	0	0		First amendment right to support unions
	0	0		Administratively burdensome if Rule is changed
	0	0		Don't change automatic deduction
				Disproportionately impacts women and people of color.
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		Undermines unions
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	Pro-union
				Government shouldn't tell us how to spend our own money
	0	0		First amendment right to support unions
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	Pro-union
				Providers should have choice of voluntary deductions
	0	0		Violates civil rights
				Government shouldn't tell us how to spend our own money
No	0	1	No	Pro-union
	0	0		May reduce the number of people receiving LTSS in the community
	0	0		Government shouldn't tell us how to spend our own money
No	0	1	No	Pro-union
	0	0		First amendment right to support unions
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
				Government shouldn't tell us how to spend our own money
No	0	1	No	Pro-union
				May reduce the number of people receiving LTSS in the community
	0	0		Administratively burdensome if Rule is changed
	0	0		Afraid will lose insurance coverage

No	0	1		Pro-union
	0	0		Afraid will lose insurance coverage
	0	0		Administratively burdensome if Rule is changed
	0	0		Government shouldn't tell us how to spend our own money
				May reduce the number of people receiving LTSS
No	0	1	No	in the community
	0	0		Pro-union
	0	0		First amendment right to support unions
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
No	1	0	No	Anti-union
No	0	1	No	Pro-union
				Government shouldn't tell us how to spend our own money
	0	0		Afraid will lose insurance coverage
	0	0		First amendment right to support unions
	0	0		Administratively burdensome if Rule is changed
				Providers should have choice of voluntary
No	1	0	No	deductions
				May reduce the number of people receiving LTSS
No	0	1	No	in the community
	0	0		May reduce qualified provider numbers
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		First amendment right to support unions
				Government shouldn't tell us how to spend our own money
	0	0		Disproportionately impacts women and people of color.
No	0	1		Rule would harm patients
	0	0		May reduce qualified provider numbers
	0	0		Pro-union
	0	0		Rule would harm workers
	0	0		Administratively burdensome if Rule is changed
	0	0		Undermines unions
	0	0		30 day comment period unfair
	0	0		Does not violate Social Security Act
				Government shouldn't tell us how to spend our own money
No	0	1	No	own money
	0	0		Pro-union
	0	0		Administratively burdensome if Rule is changed
No	1	0	No	Pro-union
No	0	1	No	Pro-union
				Government shouldn't tell us how to spend our own money
	0	0		own money

	0	0		First amendment right to support unions
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		Don't change automatic deduction
No	0	1	No	Pro-union
				Government shouldn't tell us how to spend our own money
	0	0		Don't change automatic deduction
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	Pro-union
				Government shouldn't tell us how to spend our own money
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	N/A
No	1	0	No	Medicaid funds should not be diverted for unions
				Providers should have choice of voluntary deductions
	0	0		Tax dollars should not be used to collect union dues
No	0	1	No	Administratively burdensome if Rule is changed
	0	0		Pro-union
	0	0		30 day comment period unfair
No	0	1	No	Administratively burdensome if Rule is changed
	0	0		Pro-union
	0	0		Afraid will lose insurance coverage
				Government shouldn't tell us how to spend our own money
No	1	0	No	Pro-union
				Providers should have choice of voluntary deductions
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
	0	0		Afraid will lose insurance coverage
	0	0		Don't change automatic deduction
				Providers should have choice of voluntary deductions
No	1	0	No	
No	0	1	No	Pro-union
				Government shouldn't tell us how to spend our own money
	0	0		Providers should have choice of voluntary deductions
No	0	1	No	
No	0	1	No	N/A
No	0	1	Yes	Does not violate Social Security Act
	0	0		Afraid will lose insurance coverage
	0	0		Pro-union

	0	0		Disproportionately impacts women and people of color.
	0	0		Hurts those who don't have bank accounts
	0	0		Undermines consumer directed care system
	0	0		The regulation conflicts with the National Labor Relations Act which allows home care worker agencies to deduct union dues from paycheck
	0	0		Section 1902(a)(32) was passed to prevent providers from selling accounts receivables at a discount to private entities for the purpose of "factoring," or submitting false or inflated claims to the federal government, not to prevent union dues and benefits from being taken out of individual providers' pay.
	0	0		30 day comment period unfair
	0	0		Undermines unions
	0	0		Providers should have choice of voluntary deductions
No	1	0	No	Anti-union
	0	0		Anti-union
No	1	0	No	Stop unauthorized automatic deductions for union dues
	0	0		Anti-union
No	1	0	No	Providers should have choice of voluntary deductions
	0	0		Governments should not be in the business of collecting union dues
No	0	1	Yes	Afraid will lose insurance coverage
	0	0		Pro-union
	0	0		May reduce the number of people receiving LTSS in the community
	0	0		May reduce qualified provider numbers
	0	0		Rule would harm workers
	0	0		Rule would harm patients
	0	0		First amendment right to support unions
	0	0		CMS failed to conduct an analysis of the impact of the proposed action
	0	0		Administratively burdensome if Rule is changed
	0	0		Hurts those who don't have bank accounts
	0	0		No evidence that consumers or providers want rule change
	0	0		30 day comment period unfair
No	0	1	No	First amendment right to support unions
	0	0		May reduce the number of people receiving LTSS in the community

	0	0		Rule would harm patients
No	0	1	No	Pro-union
	0	0		May reduce qualified provider numbers
No	1	0	No	Stop dues skimming
No	0	1	No	N/A
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
				Government shouldn't tell us how to spend our
	0	0		own money
No	1	0	No	N/A
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
				Government shouldn't tell us how to spend our
No	0	1	No	own money
	0	0		Pro-union
				Providers should have choice of voluntary
No	1	0	No	deductions
				Stop unauthorized automatic deductions for
	0	0		union dues
No	0	1	No	Afraid will lose insurance coverage
	0	0		First amendment right to support unions
	0	0		Administratively burdensome if Rule is changed
	0	0		Pro-union
No	0	1	No	Pro-union
				Government shouldn't tell us how to spend our
	0	0		own money
				Government shouldn't tell us how to spend our
No	0	1	No	own money
	0	0		Administratively burdensome if Rule is changed
	0	0		Pro-union
No	0	1	No	Undermines unions
	0	0		Pro-union
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	Pro-union
	0	0		Administratively burdensome if Rule is changed
				Government shouldn't tell us how to spend our
No	0	1	No	own money
	0	0		Administratively burdensome if Rule is changed
	0	0		Afraid will lose insurance coverage
				Government shouldn't tell us how to spend our
No	0	1	No	own money
	0	0		Administratively burdensome if Rule is changed
	0	0		Pro-union
No	0	1	No	Undermines unions
No	0	1	No	N/A
No	0	1	No	Undermines unions
	0	0		Administratively burdensome if Rule is changed

	0	0		Afraid will lose insurance coverage
	0	0		Pro-union
No	1	0	No	N/A
	0	1	No	Undermines unions
				Providers should have choice of voluntary
No	1	0	No	deductions
No	1	0	No	Anti-union
				Providers should have choice of voluntary
No	1	0	No	deductions
No	1	0	No	Anti-union
No	1	0	No	N/A
No	1	0	No	Anti-union
No	1	0	No	Illegally taking dues from pay
No	0	1	No	Undermines unions
				Government shouldn't tell us how to spend our
No	0	1	No	own money
No	1	0	No	Illegally taking dues from pay
				Providers should have choice of voluntary
No	1	0	No	deductions
No	0	0	No	N/A
No	1	0	No	Anti-union
No	1	0	No	Anti-union
				Wasn't aware union dues were used to pay for
No	1	0	No	abortions
				Stop unauthorized automatic deductions for
No	1	0	No	union dues
No	0	1	No	Undermines unions
	0	0		Rule would harm patients
No	0	1	No	Rule would harm patients
No	0	1	No	Rule would harm patients
No	1	0	No	Illegally taking dues from pay
				Disproportionately impacts women and people
No	0	1	No	of color.
No	0	1	No	Rule would harm patients
	0	0		Rule would harm workers
No	1	0	No	Stop dues skimming
No	1	0	No	N/A
No	0	1	No	Administratively burdensome if Rule is changed
No	0	1	No	Administratively burdensome if Rule is changed
	0	0		Afraid will lose insurance coverage
No	0	1	No	Administratively burdensome if Rule is changed
No	0	1	No	Pro-union
No	1	0	No	Stop dues skimming
No	0	1	No	Administratively burdensome if Rule is changed
				Government shouldn't tell us how to spend our
	0	0		own money
No	1	0	No	Stop dues skimming

No	0	1	No	Administratively burdensome if Rule is changed
No	1	0	No	N/A
No	1	0	No	N/A
No	0	1	No	Undermines consumer directed care system
	0	0		Rule would harm patients
	0	0		Rule would harm workers
				No evidence that consumers or providers want rule change
No	1	0	No	N/A
				Section 1902(a)(32) was passed to prevent providers from selling accounts receivables at a discount to private entities for the purpose of "factoring," or submitting false or inflated claims to the federal government, not to prevent union dues and benefits from being taken out of individual providers' pay.
No	0	1	No	The 2012 NPRM stated "The statutory direct payment provision was intended to address the issue of factoring." 77 Fed. Reg. 26362, 26392 (May 3, 2012) (emphasis added).
	0	0		Finally, the federal courts have agreed that the purpose of the statutory prohibition is to prevent factoring. The United States Court of Appeals for the Fifth Circuit has found, "An examination of the legislative history of this provision reveals that its purpose was to prevent 'factoring' agencies from purchasing Medicare and Medicaid accounts receivable at a discount and then serving as the collection agency for the accounts." In Re Missionary Baptist Foundation of America, Inc., 796 F.2d 752, 757 n. 6 (5th Cir. 1986) (emphasis added).
	0	0		Rule would harm patients
	0	0		Rule would harm workers
				Cost savings from collective purchasing.
				"Indeed, there may be cost savings resulting from the collective purchase of such benefits and greater workforce stability." 79 Fed. Reg. 2948, 3002 (Ja. 16, 2014). The Department stated further, "For the classes of practitioners for whom the state is the only or primary payer, these payment arrangements are an efficient and effective method for ensuring that the workforce has health and welfare benefits and adequate training for their functioning."
	0	0		

				CMS is contradicting the original intent of the rule of providing state flexibility in payment: "CMS has long sought to ensure maximum state flexibility to design state-specific payment methodologies that help ensure a strong, committed, and well-trained work force. Currently, certain categories of Medicaid covered services, for which Medicaid is a primary payer, such as personal care services, suffer from especially high rates of turnover and low levels of participation. We believe the proposed provider payment reassignment provision retained in the final rule will provide to states additional tools to help foster a stable and high performing workforce."
	0	0		
No	1	0	No	Anti-union
				CMS failed to conduct an analysis of the impact of the proposed action
No	0	1	No	Stop dues skimming
No	1	0	No	Stop dues skimming
No	0	1	No	N/A
No	0	1	No	Don't change automatic deduction
No	1	0	No	Stop dues skimming
	0	1	No	Government shouldn't tell us how to spend our own money
	0	0		Undermines unions
	0	0		Afraid will lose insurance coverage
	0	0		Administratively burdensome if Rule is changed
	0	0		Rule would harm patients
	0	0		Rule would harm workers
No	0	1	No	Rule would harm patients
No	0	1	No	Undermines unions
	0	0		Rule would harm patients
No	0	1	No	First amendment right to support unions
No	0	1	No	Administratively burdensome if Rule is changed
	0	0		Government shouldn't tell us how to spend our own money
	0	0		Pro-union
No	0	1	No	Administratively burdensome if Rule is changed
	0	0		Government shouldn't tell us how to spend our own money
	0	0		Pro-union
No	0	1	No	First amendment right to support unions
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	Undermines unions
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	Administratively burdensome if Rule is changed
	0	0		Afraid will lose insurance coverage

No	0	1	No	Undermines unions
No	0	1	No	Administratively burdensome if Rule is changed
No	0	1	No	Undermines unions
	0	0		Afraid will lose insurance coverage
	0	0		Rule would harm patients
	0	0		Rule would harm workers
				Government shouldn't tell us how to spend our own money
No	0	1	No	Rule would harm patients
No	0	1	No	Rule would harm patients
No	0	1	No	Undermines unions
No	0	1	No	Administratively burdensome if Rule is changed
				Stop unauthorized automatic deductions for union dues
No	1	0	No	Providers should have choice of voluntary deductions
No	1	0	No	Providers should have choice of voluntary deductions
No	1	0	No	deductions
No	1	0	No	Anti-union
No	1	0	No	Anti-union
No	0	1	No	Does not violate Social Security Act
	0	0		Rule would harm patients
	0	0		Rule would harm workers
	0	0		Afraid will lose insurance coverage
	0	0		Administratively burdensome if Rule is changed
				CMS failed to conduct an analysis of the impact of the proposed action
	0	0		30 day comment period unfair
	0	0		

CMS claim in NPRM that rule is "designed to ensure that taxpayer dollars dedicated to providing healthcare services for low-income vulnerable Americans are not siphoned away for other purposes" is false. The union dues are deducted from already earned income and diverted from Medicaid services. These services have already been provided and the dues are coming out of the expenses already incurred, not from budgeted amounts for those services.

	0	0		Government shouldn't tell us how to spend our own money
No	0	1	No	Pro-union
	0	0		Violates First Amendment
	0	0		Administratively burdensome if Rule is changed
				Government shouldn't tell us how to spend our own money
No	0	1	No	own money
	0	0		Administratively burdensome if Rule is changed

	0	0		Undermines unions
No	1	0	No	N/A
No	0	1	No	Pro-union
	0	0		Afraid will lose insurance coverage
				Government shouldn't tell us how to spend our own money
	0	0		Administratively burdensome if Rule is changed
No	0	1	No	Undermines unions
	0	0		Administratively burdensome if Rule is changed
				Government shouldn't tell us how to spend our own money
	0	0		Stop unauthorized automatic deductions for union dues
No	1	0	No	Does not violate Social Security Act
No	0	1	Yes	Rule would harm patients
	0	0		Rule would harm workers
	0	0		Undermines consumer directed care system
				Section 1902(a)(32) was passed to prevent providers from selling accounts receivables at a discount to private entities for the purpose of "factoring," or submitting false or inflated claims to the federal government, not to prevent union dues and benefits from being taken out of individual providers' pay.
	0	0		
				The regulation conflicts with the National Labor Relations Act which allows home care worker agencies to deduct union dues from paycheck
	0	0		CMS failed to conduct an analysis of the impact of the proposed action
	0	0		Governments should not be in the business of collecting union dues
No	1	0	No	Anti-union
No	1	0	No	Anti-union
No	1	0	No	Anti-union
No	1	0	No	Stop dues skimming
				Governments should not be in the business of collecting union dues
No	1	0		
	0	0		Medicaid funds should not be diverted for unions
				Violates Section 32 of the SSA. In 2014, CMS conceded that Section 32 "does not expressly provide for additional exceptions to the direct payment principle."
	0	0		Section 447.10(g)(4) facilitates improper uses of Medicaid funds
	0	0		

0	0	<p>CMS should clarify or refute statement in Q&As that “[r]emoval of the regulatory text at 42 CFR 447.10(g)(4) will not apply to payment for services rendered under Sections 1915(c), 1915(i), 1915(j), and 1915(k) authorities, nor will it impact a state’s ability to perform Financial Management Services (FMS) or secure FMS through a vendor arrangement.” Section 32 and 42 C.F.R. § 447.10 unquestionably apply to programs that operate under Sections 1915(c), 1915(i), 1915(j), and 1915(k) authorities. The vast majority of self-directed homecare programs operate under those authorities.</p>
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0	0	<p>CMS should promulgate regulatory language or, at least make clear in the final rule, that Section 32 permits states to assign Medicaid monies owed to personal care pro-viders only to government agencies or by court order—which will permit necessary tax de-ductions—and not to private third parties, such as unions and their political action com-mittees, including when payments are made through intermediaries. The Foundation rec-ommends that the following language be added as a new section, 42 C.F.R. § 447.10(i): "Payments to employees of beneficiaries. Payments to individual practitioners who are employed, in whole or in part, by a beneficiary can be assigned only to a government agency or entity or by court order, including where such payments are made through a fiscal agent, financial management service, or-ganized health care delivery system, or pass-through intermediary."</p>
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0	0	<p>CMS should immediately take enforcement actions against states that are violating Section 32 after CMS rescinds the Section 447.10(g)(4) regulatory exemption.</p>
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			<p>Payment can only be made to the provider or beneficiary, even if they voluntarily agree to have a portion pay deducted for union dues. Section 32 provides that payments cannot be made to anyone other than a provider or beneficiary “under an assignment or power of attorney or otherwise.” <i>Id.</i> (emphasis added). This means that providers and beneficiaries cannot agree, even voluntarily, to assign their payments to any other party, except as permitted in the statutory exceptions. Section 32 was enacted, in part, to prevent physicians and other providers from voluntarily assigning their Medicaid payments to private third parties known as “factors.” See, e.g., 41 Fed. Reg. 36207 (Aug. 27, 1976); <i>Prof’l Factoring Serv. Ass’n v. Mathews</i>, 422 F. Supp. 250, 251-52 (S.D.N.Y. 1976). Consequently, it is irrelevant under Section 32 whether a provider’s assignment of Medicaid monies to another party is done voluntarily or involuntarily.² Section 32 requires that payments must be made directly to the provider or beneficiary, save as permitted by the statute’s exceptions.</p>
	0	0	
			<p>CMS has absolutely no statutory authority to add a completely new exemption to Section 32. Indeed, the previous administration admitted its violation of this principle in the comments quoted above, stating that Section 32 “does not expressly provide for additional exceptions to the direct payment principle,” and that the exemption was “not contemplated under the statute,” and is “an additional exception.” Despite this admission, the previous administration carved a new regulatory exemption into Section 32 for payments “made to a third party on behalf of the individual practitioner for benefits such as health insurance, skills training and other benefits customary for employees.” 42 C.F.R. § 447.10(g)(4). The new exemption must be rescinded as inconsistent with the statutory text.</p>
No	0	0	Stop dues skimming
	1	0	

	0	0		It is also important that states not contradict federal law that makes it illegal to divert Medicaid funds to unions.
				Section 32 includes several specific and well-defined exceptions to this requirement and does not delegate authority to the HHS Secretary to add exceptions.
No	1	0	No	
	0	0		Removing 42 C.F.R. § 447.10(g)(4) will in no way prevent workers from voluntarily joining a union.
No	1	0	No	N/A
No	0	1	Yes	Reduces state flexibility
	0	0		Undermines consumer directed care system
	0	0		May reduce qualified provider numbers
No	1	0	No	N/A
No	1	0	No	Eliminate public employee unions
				The 2014 regulation established an option that states can elect to implement and is not a requirement.
No	0	1	Yes	Reduces state flexibility
	0	0		May reduce qualified provider numbers
	0	0		
	0	0		The regulation may inadvertently limit the ability of states to ensure that there are appropriate supports for individuals who self-direct their long-term services and supports (LTSS).
	0	0		Recommend including language that specifically allows for the option to deduct finance costs associated with self-directed care, including fiscal intermediary services, payroll taxes, and other necessary expenses.
No	1	0	No	N/A
				The current regulatory text is overbroad and allows an unaccountable and unintended use of Medicaid funds that does not help the vulnerable persons those funds are intended to assist.
No	1	0	No	
	0	0		The diversion to SEIU of Medicaid funds intended for homecare providers has allowed the union to spend millions of dollars on political activities.
	0	0		Diverts money from home care
No	1	0	No	N/A
No	1	0	No	Stop dues skimming
No	1	0	No	N/A
No	0	1	No	Rule would harm patients
	0	0		Rule would harm workers

No	1	0	No	N/A
No	0	1	Yes	Rule would harm patients
	0	0		Rule would harm workers
	0	0		Undermines unions
No	1	0	No	Diverts money from home care
No	1	0	No	N/A
No	0	1	No	Afraid will lose insurance coverage
				The proposed rule threatens to disrupt access to group health coverage for home health care workers and could result in an overall drop in health outcomes for populations other than home health care workers.
	0	0		May reduce qualified provider numbers
	0	0		
No	1	0	No	Anti-union
No	1	0	No	Anti-union
No	0	0	No	N/A
No	1	0	No	Anti-union
No	1	0	No	Anti-union
No	1	0	No	Stop dues skimming
No	1	0	No	Anti-union
No	1	0	No	Stop dues skimming
No	0	0	No	N/A
No	1	0	No	N/A
No	1	0	No	Stop dues skimming
				CMS has absolutely no statutory authority to add a completely new exemption to Section 32.
				Indeed, the previous administration admitted its violation of this principle in the comments quoted above, stating that Section 32 “does not
No	1	0	No	expressly provide for a
	0	0		Diverts money from home care
No	1	0	No	Stop dues skimming
No	0	1	Yes	Undermines unions
	0	0		Undermines consumer directed care system
				CMS failed to conduct an analysis of the impact of the proposed action
	0	0		30 day comment period unfair
	0	0		

cms provides no other explanation to back up the concern that the provision is “overbroad and insufficiently linked to the exceptions expressly permitted by the statute.” or any of the detail concerning its reasoning that one would normally expect in the preamble to a rule, particularly one seeking to completely repeal current established policy that was last reviewed by the agency relatively recently.

This description of the flow of dollars under current payment arrangements is a gross mischaracterization that at best reflects a profound lack of understanding of IP home care payment structures and at worst is deliberately misleading. Deductions made by states on behalf of home care workers for dues and other costs, such as health benefits, do not “divert” or “siphon” Medicaid dollars from any state Medicaid program. Rather, as described above, individual provider home care workers receive payments from state Medicaid programs for services they provide to home care consumers. For these providers, these payments function just like hourly wage payments. There is no “diversion” because the amount deducted for dues comes from the payment for services that has been made to the provider, who then voluntarily chooses to direct it to a union or for

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CMS is mischaracterizing or misunderstand the flow of payments to home care providers. The NPRM notes that the rule will end the ability of states to “divert Medicaid payments away from providers” and claims that the rule is “designed to ensure that taxpayer dollars dedicated to providing healthcare services for low income vulnerable Americans are not siphoned away for other purposes.”⁵ These claims echo the contention of Senator Ron Johnson, in a letter he sent to CMS and in a follow-up staff report from the Committee on Homeland Security and Government Affairs, that states are “skimming” dues from Medicaid payments that would otherwise go to provide care for Medicaid recipients. The NPRM’s regulatory impact analysis reflects a similar misunderstanding, suggesting for instance that states may be increasing reimbursement levels in order to reassign portions of the provider payment to a third party and that they may lower those rates if providers are no longer able to deduct payments for dues or other benefits.

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Courts have uniformly concluded that similar arrangements, where funds are automatically transferred to a third party (such as so-called “double lockbox” arrangements used to convey Medicaid provider payments to a third party pursuant to the provider’s standing instructions, or payments directly to HMOs pursuant to contracts with their Medicaid-funded practitioners, as authorized by 42 CFR § 447.10(g)(3) despite the lack of any corresponding statutory authority) are valid so long as they are consistent with the purposes of the statute.

0 0

Deductions made from a home care worker’s Medicaid payment do not confer any right to the entity to which the deduction is directed, whether for health insurance, union dues, or tax payments, to make a claim against the Medicaid program; they are merely an expression of the home care worker’s ability to direct dollars that she owns as she chooses. See *Janus v. AFSCME Council 31, et al.*, 138 S.Ct. 2448, 2486 (2018).

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		The NPRM singles out dues deductions to unions as the sole example of a practice that will be implicated by the new rule, despite the fact that neither the statute or previous regulation ever mention unions or deductions for union dues. This amounts to a substantial policy shift for which CMS provides no policy rationale. It will have a major impact on states, providers and consumers who have built consumer directed programs in reliance on CMS's position that payments like those described in 2014 regulation are allowable.
0	0	
0	0	Disproportionately impacts women and people of color.
0	0	Rule would harm workers
		Eliminating the ability of workers to participate in a health plan is likely to shift them to the state Medicaid program or other publicly subsidized coverage, likely leading to higher rather than lower costs for the state.
0	0	
0	0	Administratively burdensome if Rule is changed
		The NPRM contradicts CMS's push for state flexibility. 2014 rule does not require states to deduct payments on behalf of home care workers, but rather leaves it up to states choose to do so if they believe that electing such payment arrangements would benefit the Medicaid program. In its discussion of the initial proposal of the 2014 rule change, CMS noted that CMS had "long sought to ensure maximum State flexibility to design State-specific payment methodologies that help ensure a strong, committed, and well-trained workforce." ³² The proposed rule would take away this flexibility and subject states to a one-size-fits-all restriction that is completely at odds with Administrator Verma's goal, expressed on numerous occasions, of increasing flexibility for states to manage their Medicaid programs.
0	0	

			Executive Orders 12866 and 13563 direct agencies to perform cost benefit analyses of proposed regulations and to select regulatory approaches that maximize net benefits, “including potential economic, environmental, public health and safety, and other advantages; distributive impacts; and equity.” ³⁴ The criteria for determining whether a rule can be considered economically significant takes into account not only the impact of the regulation on the economy as measured in dollar terms, but also broader effects. ³⁵ Yet not only is CMS unable to provide an analysis of the direct dollar impact of the regulation—acknowledging that it lacks sufficient data and relying on assertions from a single newspaper opinion piece to support a speculative and preliminary estimate, the NPRM also lacks any discussion of the broader impact of the rule. Furthermore, given that the rule contemplates prohibiting deductions for costs such as health care, a full impact analysis should consider the potential impact on state Medicaid programs and the Federal budget of shifting workers who lose access to coverage to Medicaid or other publicly subsidized forms of health coverage.
	0	0	
No	1	0	Section 32 includes several specific and well-defined exceptions to this requirement and does not delegate authority to the HHS Secretary to add exceptions.
	0	0	Providers should have choice of voluntary deductions
No	1	0	No Stop dues skimming
No	0	1	No Undermines unions
	0	0	First amendment right to support unions
	0	0	Disproportionately impacts women and people of color.
	0	0	May reduce qualified provider numbers
	0	0	CMS failed to conduct an analysis of the impact of the proposed action
	0	0	30 day comment period unfair
No	1	0	No N/A
No	1	0	No Stop dues skimming
No	0	0	No N/A
No	1	0	No Stop dues skimming
No	1	0	No Anti-union

No	1	0	No	Stop dues skimming
No	1	0	No	Stop dues skimming
N	1	0	0	NPRM aligns with statute and 2014 reg did not.
N	1	0	0	References insurance companies.
N	1	0	0	References issues in Medicare Advantage.
N	0	0	0	Refers to funds used on kids.
				References insurance companies and challenges
N	0	0	0	of doctors in PR.
N	0	0	0	References insurance companies.
N	0	0	0	References issues in Medicare Advantage.
N	0	0	0	References issues in Medicare Advantage.
N	1	0	0	
N	1	0	0	Extrapolated opposition/support from comment.
N	1	0	0	Extrapolated opposition/support from comment.
N	1	0	0	
N	1	0	0	
N	1	0	0	
				Extrapolated opposition/support from comment.
N	1	0	0	References insurance companies.
				General comments about working conditions.
N	0	0	0	References insurance companies
N	1	0	0	Extrapolated opposition/support from comment.
N	1	0	0	
N	1	0	0	Stop skimming union dues.
N	1	0	0	Duplicate of 0981.
Y	0	1	0	Part of CA Write In Campaign; more unique text than similarity
Y	0	1	0	Part of CA Write In Campaign; more unique text than similarity
				Also, requested extension of 30 day comment period.
N	0	1	0	
N	0	1	0	
N	1	0	0	
Y	0	1	0	Part of CA Write In Campaign; more unique text than similarity
N	0	1	0	
				State laws allow state to deduct voluntary contributions from union members to unions
N	1	0	0	Political Action Funds and union dues.
				Complaints about Medicaid not being available in county and issues with SSA
N	0	0	0	
N	0	0	0	No interpretable comment.

Y	0	1	0	Part of CA Write In Campaign; more unique text than similarity
Y	1	0	0	Stop skimming union dues. Duplicate of 0021.
N	0	0	0	Alternative suggestion to match 1902(a)(32)(B) that permits assignment to governmental agency or non-governmental agency. Claims 11 states illegal skims dues.
N	1	0	0	VT passed collective bargaining agreement (ED: 7/1/2018) that state can subtract 2% from home care workers if they elect to join union
N	1	0	0	Extrapolated opposition/support from comment. References insurance companies.
N	1	0	0	Questions on how caregivers are public employees.
N	0	1	0	Extrapolated opposition/support from comment.
Y	0	1	0	Part of CA Write In Campaign; more unique text than similarity Indicated major issues of adopt this rule (dramatically rewrite the current Medicaid statute, would disallow longstanding practices (deductions from their own wages for voluntary union dues and health insurance coverage) adopted by many states, home care workers in jeopardy of losing their health coverage....Home care jobs ...come with customary benefits like health insurance help reduce turnover, and guarantee consistent quality services.
N	0	1	1	From IHHS provider: eliminating voluntary deductions will cancel her participation in group health insurance that is otherwise unaffordable
N	0	1	1	Rule will harm home care workers that prevent people from going into institutions that save government money.
N	1	0	0	Extrapolated opposition/support from comment.

N	0	1	1	<p>Make it harder to join/pay union.</p> <p>Home health care workers may be abused without union to protect them.</p> <p>Survey research on home care workers from National Employment Law Project that details how unions help home health care workers. Part time work necessitates additional jobs. Low pay. Few benefits. Workers are primarily women of color.</p>
N	0	1	1	<p>Rule will harm home care workers that prevent people from going into institutions that save government money.</p> <p>Recommended voluntary joining of unions and money should go to home care workers to provide care.</p> <p>Rule will harm home care workers that prevent people from going into institutions that save government money.</p>
N	1	0	1	Unions are criminal.
N	1	0	0	

N	0	0	0	<p>Extend 30 daycomment period.</p> <p>Under section 2(b) of Executive Order 13563, Improving Regulation and Regulatory Review, the Department must afford the public a meaningful opportunity to commentwith a comment period that should generally be at least 60 days.</p> <p>2014 Reg was 60 days.</p> <p>Reg impacts at least 11 states.</p> <p>Issue with lack of economic analysis.</p>
N	1	0	0	<p>Original 2014 regulation was passed without HHS having proper authority and does not align with statute passed by Congress.</p> <p>Economic impact estimates: states have become dues collectors that deduct \$1000/year from independent in-home health workers for a total of \$1.4 billion (since passing of 2014 regulation?), including \$150 million in 2017.</p>
N	1	0	0	<p>References Medicare Advantage and IPAs and challenges of doctors in PR</p>

				Campaign to decertify the SEIU as it pertained to the questionable certification to unionize Personal Care Attendants (PCAs) in Minnesota. State doesn't track amount reassigned to third parties.
				SEUI takes 3% out of Medicaid stipends of PCAs; estimated \$71 million total.
N	1	0	1	Coercive tactics by union to get certified and sign up members
N	1	0	0	
				Rule will endanger ability of home care workers to get health insurance because premiums are deducted from payroll.
N	0	1	0	
N	1	0	0	References insurance companies.
				Commenter is member of union that many commenters have called out as problematic or being a member of.
				Extend 30 day comment period.
				Under section 2(b) of Executive Order 13563, Improving Regulation and Regulatory Review, the Department must afford the public a meaningful opportunity to comment with a comment period that should generally be at least 60 days.
				No explanation for 30 day comment period and issue with lack of economic analysis and how many states do reassign payment.
N	0	0	0	No data to support assertion that Medicaid funds are being improperly used/diverted.
				No explanation for 30 day comment period and issue with lack of economic analysis.
				Rule will intrude on state sovereignty and impair CA law that allows collective bargaining for home care workers.
N	0	1	0	
N	1	0	0	
				Extrapolated opposition/support from comment.
N	1	0	0	
N	0	1	0	
N	0	1	0	
				References Medicare Advantage and IPAs and challenges of doctors in PR
N	0	0	0	

				CMS is singling out unions as the only example of a practice that would be impacted by eliminating this provision.
N	0	1	0	No data to support assertion that Medicaid funds are being improperly used/diverted
				NPRM exacerbates issues employing home care workers and their important service role.
N	0	1	0	Issue cuts across political lines and should not be subject to ideological biases.
N	0	1	0	Anti-union tactic
				NPRM is improper use of regulation to attack workers' right to collectively bargain.
N	0	1	0	Attack on rights.
				Unions enable works to get health insurance, worker's comp, standard rule, paid sick.
N	0	1	0	Attack on rights.
				Unionization has reduced turnover and improved the care relation and the reliability of care services. That is why states have chosen to engage in collective bargaining with these workers.
N	0	1	0	Attack on rights/union.
				Fast tracking rule. Standard practice for proposed federal rule changes is to allow for a 60-day open comment period before the proposal can be implemented.
N	0	1	0	
N	0	1	0	Attack /undermine unions.
				No data to support assertion that Medicaid funds are being improperly used/diverted.
				Attack on rights/obstructing worker's legal right to join unions.
N	0	1	0	
N	0	1	0	Attck on rights.
N	0	1	0	Attack on rights/unions.
N	0	1	0	Attack on rights.
				Suggested violation of 1st amendment to have the right to join and support a union.
N	0	1	0	

				Fast tracking rule. Standard practice for proposed federal rule changes is to allow for a 60-day open comment period before the proposal can be implemented.
				Unions enable works to get health insurance, worker's comp, standard rule, paid sick.
				Unionization has reduced turnover and improved the care relation and the reliability of care services. That is why states have chosen to engage in collective bargaining with these workers.
N	0	1	0	
N	0	1	0	
N	0	1	1	
				No evidence of reassignment in MO, but nothing prohibiting it.
				Government obligated to ensure stewardship and allowing reassignment violates government duties.
N	1	0	0	Wants an end to dues skimming.
				Union many commenters have called out as problematic or being a member of.
				Extend 30 daycomment period. Under section 2(b) of Executive Order 13563, Improving Regulation and Regulatory Review, the Department must afford the public a meaningful opportunity to commentwith a comment period that should generally be at least 60 days.
				2014 Reg was 60 days.
N	0	0	0	No explanation for 30 day comment period and issue with lack of economic analysis.
				Homecare workers need more training, higher salaries, better retention mechanisms, and more support. Proposal does not address these needs.
N	0	1	1	
				Stop skimming union dues.
				Suggested alternative: better oversight, fraud prevention, and provider education/partnership to fix issues with unions skimming dues.
N	1	0	0	Attack on anti-worker organizations/unions and seniors/low income/disabled.
				NPRM prohibits workers from choosing to have their own union dues deducted from their paycheck and threatens health care insurance (no more premium deductions).
N	0	1	0	
N	0	1	0	Attack on unions and working class people.

				NPRM will make it more difficult for workers to organize and maintain unions which leads to reduction in wages and working conditions.
N	0	1	0	
N	1	0	0	
				NPRM will jeopardize the critical care network that many of our members depend on to live in our homes and communities and oversteps a workers right to health insurance and their choice to be a union member, and hinders the unions ability to fight for home care programs like IHSS.
N	0	1	1	Providers in network are home care and should have right to be in a union.
N	1	0	0	Suggested funds go to union first and then the home care workers gets the leftover balance.
N	1	0	0	
				Attack rights.
				Standard practice for proposed federal rule changes is to allow for a 60-day open comment period before the proposal can be implemented.
				Unions enable works to get health insurance, worker's comp, standard rule, paid sick.
				Unionization has reduced turnover and improved the care relation and the reliability of care services. That is why states have chosen to engage in collective bargaining with these workers.
N	0	1	0	No data to support assertion that Medicaid funds are being improperly used/diverted
N	0	1	0	NPRM will enhance obstacles to joining unions.
N	0	1	0	NPRM disenfranchises unions.
N	0	0	0	References Medicare Advantage
N	0	1	0	
				Extrapolated opposition/support from comment.
N	1	0	0	References Medicare Advantage
N	1	0	0	References insurance companies.
N	1	0	0	References Medicaid Advantage and insurance companies.
N	1	0	0	Extrapolated opposition/support from comment.
N	1	0	0	Extrapolated opposition/support from comment.
N	1	0	0	2014 Reg was adopted by a government agency (CMS) contradicted a law passed by congress.

N	1	0	0	Extrapolated opposition/support from comment. NPRM does not improve effectiveness or efficiency of home health care under CMS. No data to support assertion that Medicaid funds are being improperly used/diverted.
N	0	1	0	Attack on unions. Attack on rights to join union. Violates fundamental justice. threatens the well-being of these particular workers, erodes the quality of care.
N	0	1	0	Attack on workers.
N	0	1	0	Makes it harder to join a union. Workers join on voluntary basis. No data to support assertion that Medicaid funds are being improperly used/diverted. Unions enable works to get health insurance, worker's comp, standard rule, paid sick. Unionization has reduced turnover and improved the care relation and the reliability of care services. That is why states have chosen to engage in collective bargaining with these workers.
N	0	1	0	Rule does not service public interest.
N	1	0	0	Extrapolated opposition/support from comment. Frustrating experience with union.
N	1	0	0	2014 Reg was adopted by a government agency (CMS) contradicted a law passed by congress. Worker indicated when she began working as a caregiver for the state that she had to sign up for the union or wouldn't get paid.
N	1	0	0	Frustrating experience with union.
N	1	0	0	Frustrating experience with union.
N	0	1	0	Interferes with healthcare delivery to home health care providers and their familias in CA and creates burden without automatic deductions. Deductions are not "assignments".

				Estimated \$150 million in Medicaid funds paid to unions for home care workers in 2017. \$1.4 billion in the last 17 years. Source: https://www.freedomfoundation.com/wp-content/uploads/2018/07/Getting-Organized-at-Home.pdf
				Alternative suggestion: issue a letter to states engaged in the practice of dues skimming and tell them they must stop + federal rules can be adopted making this practice illegal when using federal funds.
N	1	0	0	NPRM will reduce access to dental care for home health care providers and their families, increase admin costs that drive up premiums, and exceeds intention of Congress.
N	0	1	0	Deductions are not "assignments"
N	1	0	0	References insurance companies.
				Home care workers prevent people from going into more costly institutions.
				Alternative suggestion: issue a letter to states engaged in the practice of dues skimming and tell them they must stop + federal rules can be adopted making this practice illegal when using federal funds.
N	1	0	0	Makes it harder to join a union.
N	0	1	0	
				Cited 79 FR 2947, 3001.
				Unions enable works to get health insurance, worker's comp, standard rule, paid sick.
				Unionization has reduced turnover and improved the care relation and the reliability of care services. That is why states have chosen to engage in collective bargaining with these workers.
				Standard practice for proposed federal rule changes is to allow for a 60-day open comment period before the proposal can be implemented.
				No data to support assertion that Medicaid funds are being improperly used/diverted.
				Indicated CMS needs to look at quality of care issues.
N	0	1	0	
N	1	0	0	Frustrating experience with union.

N	1	0	0	Suggested it's possible for providers to arrange for payment of dues independent of federal payments if they wish and money collected by unions are used for out-of-state political activity. Suggested the final rule should prohibit these essential Medicaid funds from being assigned to non-program related efforts, including dues to unions and their affiliates, which may be used for out-of-state political activity
N	1	0	0	CMS did not have authority for 2014 regulation. NPRM will comply with Supreme Court ruling. Referenced Freedom Foundation with estimated \$150 million in Medicaid funds in 2017 was paid to unions and \$1.4 billion total between 2000 and 2017. MN home care worker indicated \$1,000 was withheld and paid to a union she did not consent to join.
N	1	0	0	References Medicare Advantage
N	1	0	0	Frustrating experience with union.
N	1	0	0	Named 11 states that do reassign payment to unions (California, Connecticut, Illinois, Maryland, Massachusetts, Minnesota, Missouri, New Jersey, Oregon, Vermont, and Washington). Freedom Foundation of Washington state reprot estimates current dues skimming diverts \$150 million annually from Medicaid Home and Community Based Services waiver funds to unions and a total of \$1.4 billion since 2000.
N	1	0	0	Asked to clarify either in the final rule or through new regulation, that state governments cannot skim union dues or fees from Medicaid. Indicated 15 states in the last 20 years have paid more than \$1.4 billion to unions from Medicaid funds (cited Freedom Foundation). MN has taken more than \$8.5 million from home-health care providers for labor unions. MI and OH has taken more than \$36 million each. IL has taken just shy of \$100 million. Referenced Supreme Court decisions Harris v. Quinn
N	1	0	0	Frustrating experience with union.

				Unions enable works to get health insurance, worker's comp, standard rule, paid sick. Unionization has reduced turnover and improved the care relation and the reliability of care services. That is why states have chosen to engage in collective bargaining with these workers.
N	0	1	0	Home care workers need training and unionization to maintain benefits.
N	1	0	0	
				Washington State recently passed Senate Bill 6199 to privatize all home caregivers and place us under the National Labor Relations Act so employees are forced to pay mandatory union dues.
				Frustrating experience with union. Quoted \$600-1200/year goes to unions. Union spends money on political activity.
				Developmental Disabilities Administration provided/administers Medicaid in WA and commenter accused them of working closely with unions.
N	1	0	0	
				Extrapolated opposition/support from comment. Aging and Adult Services (state) is contracting with private company to provide services and now forces union dues beginning in 2019.
N	1	0	0	Referenced U.S. Supreme Court Janus decision protecting the rights of individuals not to subsidize union political activities.
N	1	0	0	Indicated no dues skimming in WI.
				CMS's August 2016 memo on Suggested Approaches for Strengthening and Stabilizing the Medicaid Home Care Workforce outlined options for states to stabilize (training, development, professional and peer support, career ladder opportunities, health insurance etc.) the workforce delivering home and community-based care (HCBS). Many of the workforce stabilization strategies encouraged in this memo rely on the current direct care worker exemption outlined in 42 CFR 447.10(g)(4).
				NPRM will reduce state flexibility and lead to higher turnover and beneficiaries in institutions whcih are more expensive.
N	0	1	0	

				<p>Attorney described many cases and examples of activities by SEIU against PCAs. Attachments include affidavits from PCAs and PCA agency personnel documenting the practices used by SEIU, a memo of my own summarizing the fraudulent practices used by SEIU, a copy of MNPCAs recent brief to the Minnesota Court of Appeals summarizing relevant facts, and an affidavit of State Representative Matthew Dean documenting the legislative chicanery of those supporting the dues skim in Minnesotas legislature this year.</p> <p>Indicated 11 states (including MN conduct dues skimming).</p> <p>Agreement between MN and SEIU indicates the state agreed to provide \$250,000 per year to the Training and Orientation Committee for providing trainings and orientation to Individual Providers.</p>
N	1	0	0	<p>Indicated that Supreme Court has ruled that unions need clear consent before collecting dues from the paychecks of public employees, but this regulation left the door open for unions to continue skimming dues from the paychecks of Medicaid caregivers.</p>
N	1	0	0	<p>NPRM intent to strip low-wage home care workers of their insurance and benefits, to politically and financially attack the unions</p>
N	0	1	0	<p>Indicated Washington Senate Bill 6199 created loophole for unions to continue collection money to get around Supreme Court Decisions Harris v. Quinn.</p> <p>Estimated that the amount of union dues that has been collected in Washington State alone from Medicaid paid caregivers totals more than \$190 million, and more than \$1.4 billion nationwide + does not include additional funds collected for contributions to political action committees.</p>
N	1	0	0	

				Estimated \$190 million in Medicaid funds has been paid to unions in Washington.
				Dues rate for the Washington Federation of State Employees is 1.5 percent. SEIU 775 collects 3.2 percent.
				Indicates that current 2014 regulation violates statute.
				Recommends providers can join union voluntarily after receiving full compensation for services.
N	1	0	0	
N	0	0	0	
N	0	0	0	
N	0	1	0	
				makes it harder to unionize.
				Will result in no financial savings,
				Discriminatory in intent because it applies only to the ability of care workers to checkoff union dues
N	0	1	0	
N	1	0	0	Extrapolated opposition/support from comment.
N	1	0	0	
				Union has done good for beneficiariy's wife who cares for him.
N	0	1	0	
N	1	0	0	
N	1	0	0	Frustrating experience with union.
N	1	0	0	Frustrating experience with union.
N	1	0	0	Union member but suppport reg.
N	1	0	0	
				Attack on rights of home care workers to be in a union.
N	0	1	0	
N	1	0	0	
N	1	0	0	
				Extrapolated opposition/support from comment.
N	0	1	0	
N	0	0	0	
				References Supreme Court Harris v. Quinn and Janus v. AFSCME.
				Indicates Washington State Senate Bill 6199 turned home health care workers into private contractors to avoid requirements of Harris decision and collect funds for union by requiring union membership to be employed and including the union dues in the contract.
N	1	0	0	

				Massachusetts: Personal Care Attendants (PCAs) are required to attend a paid 3-hour orientation to the PCA Program or get deducted from payroll at rate of \$2.00 per hour until the requirement is met. Questions impact of NPRM on orientation sanctions.
N	0	0	0	

				Duplicate of 1570. Extend 30 daycomment period. Under section 2(b) of Executive Order 13563, Improving Regulation and Regulatory Review, the Department must afford the public a meaningful opportunity to commentwith a comment period that should generally be at least 60 days. 2014 Reg was 60 days. Reg impacts at least 11 states. Issue with lack of economic analysis.
Y	0	0	0	
N	1	0	0	
N	0	1	0	Extrapolated opposition/support from comment. Duplicate of 0002.
N	1	0	0	NPRM aligns with statute and 2014 reg did not.

				Will be harder to find quality home care workers. Reduces protections for IHSS program. Prior to unions and Public Authorities (PA), the home care workers were unreliable and abusive.
N	0	1	1	
N	1	0	0	

N	1	0	0	Frustrating experience with union.
N	0	1	0	Support unions.
N	1	0	0	
N	0	1	0	Unions enable works to get health insurance, worker's comp, standard rule, paid sick.
N	0	1	1	Chris T. addressing seperately.
N	0	1	0	Support unions.
N	0	1	0	
N	0	1	0	Support unions.
N	0	0	0	References insurance companies
				Recommended the final rule or an additional regulation must make clear that Section 32 prohibits the diversion of Medicaid payments to unions and their affiliates, and that only assignments to government agencies or by court orders are permitted.
				Indicated dues are set at 3% of gross wages up to \$948 a year collected by SEUI.
				MNPCA formed to decertify SEIU in MN after unusal union election to certify them.
N	1	0	0	
N	0	1	0	Support workers.
N	0	1	0	Support workers.
N	1	0	0	
N	0	1	0	
N	1	0	0	
N	1	0	0	Stop skimming union dues.
N	0	1	0	
N	0	1	0	
N	0	1	0	
N	0	1	0	
N	0	1	0	
N	0	1	0	
N	0	1	0	Support unions.
				NPRM undermines state's ability to directly deduct payments for unions or health care coverage.
				Attack on rights.
				Issue with lack of economic analysis and impact on state, beneficiaries, and home care workers.
				Extend 30 day comment period.
N	0	1	0	Request to withdraw NPRM.
N	0	1	0	Support unions.

				Indicated 13 states, including Massachusetts, have reassigned millions in Medicaid funds to public unions.
				11 states are involved with SEIU.
				Legislation exists in MA since 2006 (H.4758) to classify home workers as public employees or state workers so they are subject to union rules and dues, but do not get other benefits (like a pension).
N	1	0	1	SEIU collects \$5.1 million/year from PCAs in MA.
N	0	1	0	
N	0	1	0	

				Payroll deductions and payment to vendors for benefits do not violate law. CA was doing it before the 2014 regulation.
				Discussed health care plan that deducts premiums for IHSS providers and the NPRM will cause problems (lay off of staff) for health care plan.
				Without health care to IHSS providers, there will be an increase in uncompensated care costs or Medicaid enrollment/cost when the providers go to the ER for care as well as a loss of revenue for the hospital because providers no longer have coverage.
				Additional deductions include transportation passes for IHSS providers.
				Rule will harm home care workers that prevent people from going into institutions that save government money.
				County provides training for IHSS providers to improve quality of care and maintain stable workforce and if the NPRM impacts training program then it will lead to turnover and fatigue.
N	0	1	1	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
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N	1	0	0	Stop skimming union dues.

N	1	0	0	Stop skimming union dues.
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N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
N	0	0	0	No interpretable comment.
N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
				Supreme Court has ruled against unions stealing
N	1	0	0	money from people.
N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
N	0	0	0	
N	1	0	0	Stop skimming union dues.
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N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
				Stop skimming union dues.
N	1	0	0	Abolish IRS.
N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
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N	1	0	0	Stop skimming union dues.
N	0	0	0	No interpretable comment.
N	1	0	0	Stop skimming union dues.
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N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
N	0	0	0	Alternative: Make rule voluntary.
N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
N	1	0	0	Stop skimming union dues.
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N	0	1	0
N	1	0	0
N	1	0	0

[illegible]

No justification for truncated 30 day comment period. CMS does not have data to support claim that rule will be economically sufficient

[illegible]

N	1	0	0
N	1	0	0
N	0	1	0
N	1	0	0
N	1	0	0
N	1	0	0
N	1	0	0
N	0	1	0
N	1	0	0

Request CMS to clarify 3 questions related to
Medicaid funded self directed HCBS

N	0	0	1
N	1	0	0
N	1	0	0
N	1	0	0
N	1	0	0
N	1	0	0
N	1	0	0
N	1	0	0
N	1	0	0
N	1	0	0
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N	1	0	0

0	0
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N	0	1	0
N	0	1	0

Proposed rule unnecessary, ill-considered and an
overreach. CMS has shortened comment period
from 60 to 30 days

N	0	1	0
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N	0	1	0
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Unusual 30 day comment period. Target union
dues suggest the proposed regulation change is
politically motivated attempt to weaken unions.
CMS is limiting the public comment period to 30
days. HCBS in Medicaid is critical to our rural
state; concerned impact of this rule on seniors
and people with disabilities.

N	0	1	0
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Troubled this rule is written to target home care
workers, 90% of whom are women and majority
women of color.

N	0	1	0
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The proposed change is completely political not
based on evidence of payroll deduction not
working. Powerful few planning to undermine
choices of millions of working women.

N	0	1	0
N	0	1	0

N	1	0	0
N	0	1	0

Low wages, lack of benefits, exploitation and economic instability also reflect that this workforce's exclusion from basic labor standards established a part of the New Deal by southern legislators in an attempt to prevent black workers from gaining labor protections.

N	0	1	0
N	0	1	0

Regulatory Flexibility Act(5U.S.C § 601) requires such certification be supported by factual basis.

N	0	1	0
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Proposed rule produce economic impact exceeding \$100 million.

Proposed rule negative impact on Medicaid HCBS and the consumer directed model. No justification for a 30 day comment period.

N	0	1	1
N	0	1	0
N	0	1	0
N	0	1	0
N	0	1	0
N	0	1	0
N	0	1	0
N	0	1	0
N	0	1	0
N	0	1	0
N	0	1	0
N	0	1	0

CMS's scant legal analysis of the rule it seeks to overturn is unlikely to survive a federal court challenge. No analysis of its economic impact; limit public comment period to 30 days.

N	0	1	0
N	0	1	0
N	0	1	0

If CMS has no intention to withdraw the rule it should at least extend the rulemaking period. CMS is proposing action reverse policy that could be economically significant. CMS has limited the public comment period to 30 days.

N	0	1	0
N	0	1	0

CMS has not quantified the financial impact. CMS has only given a truncated 30 day comment period.

N	0	1	0
N	0	1	0
N	0	1	0
N	0	1	1

Yes

N	0	1	1
---	---	---	---

No	1	0	-	-
No	0	1	-	-
No	1	0	-	-
No	0	1	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-

Do the right thing for Americans who are paying
your salary.

No	0	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	0	1	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	0	1	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-

Please govern like it's your money that you are
spending/allocating.

No	0	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-

No	1	0	-	
No	1	0	-	
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No	1	0	-	
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No	1	0	-	
No	1	0	-	
No	1	0	-	
No	1	0	-	
No	1	0	-	
No	0	0	-	Comment i
No	0	1	-	
No	0	1	-	
				I really appreciate all the
No	0	0	-	Medic
No	0	1	-	
No	0	1	-	
No	1	0	-	
No	1	0	-	
No	1	0	-	
No	1	0	-	
No	1	0	-	
No	0	1	-	
No	0	1	-	
No	0	0	-	Keep fighting
No	0	1	-	
No	0	1	-	

Comment in Spanish.

I really appreciate all the help my son gets from Medicaid.

Keep fighting for people.

as it is, seniors (70+) are at risk of infection or disease due to poor hygiene or poorly-trained staff. Especially during flu season. Fires are also a big concern at the Nursing home due to smoke detectors not working properly; or being tested... or not replacing its battery if it needs a new one. Sometimes, even Paramedics can't get to the scene in time if a resident needs to be taken to the ER - or if he or she needs to be laid to rest.

No	0	0	-
No	0	0	-
No	0	1	-
No	0	1	-
No	0	1	-
No	0	1	-
No	0	1	-
No	1	0	-
No	0	1	-
No	0	1	-
No	0	1	-
No	1	0	-

I SUPPORT HOME CARE WORKERS!

I'm a 75 year-old cancer survivor and I truly depend on my healthcare worker to help me, not only in an emergency, but in my everyday life.

No	0	0	-
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in Puerto Rico most of the elderly population is subscribed to an advantage plan. I have no problem with this if the patient services can be improved and providers are compensated as the according medicare fee schedule to that year.

The problem is that this is not happening.

Since 2017 the provider compensation fee schedule was changed thanks to funds approved to Puerto Rico with a current 2018 fee schedule that has a mean increase of 20% from that of the 2016 fee schedule.
These funds are arriving to our island but despite our original contracts with advatage plans that refers a 100% medicare fee schedule compensation, the advantage plans made unilateral changes to pur contracts keeping us providers with the 2016 fee schedule and thus keeping all the new funds for themselves...
Advantage plans have also limit provider selection freedom to patient and OPD clinics by using capitation models that limits the patient to see the provider who is willing to see a larger number of patients with a lower compensation. This practice resulta in a very poor patient management that traduces to a poor patient health status.
I think this is a travesty and the main reason why there is so much discontent in the medical class.
In the last 3 years there has been a massive exile of doctors to the US leaving us with 30% less

No	0	0	-
No	0	1	-
No	0	1	-
No	1	0	-
No	0	1	-
No	0	0	-
No	0	0	-
No	0	1	-
No	1	0	-
No	0	1	-
No	1	0	-
No	0	1	-
No	0	1	-
No	0	1	-

I support caregivers.
Obey the law and do the right thing.

				Its about time that medical advantage companies stop using patiently money in concerts ,no medical events ,tv ,news paper advertisement ,With patient money .Giving 150.00 dollars to companies personnel for every patient they enroll.This has to stop
No	0	0	-	
No	0	1	-	-
No	0	1	-	-
No	0	1	-	-
				Home-care workers are, perhaps, some of the most important workers in America, taking care of the aged and infirm. They deserve a pay commensurate with their abilities and knowledge. -not merely a minimum wage. We owe them our support and allegiance.
No	0	0	-	
No	1	0	-	-
No	0	1	-	-
				These workers are essential to the health and well being of many sick and disabled citizens.
No	0	0	-	
No	0	1	-	-
No	0	1	-	-
				My paid for patient in medicaid is 8.00 dollar for month and my paid for medicaid advantage is 50.00 dolars for moth because is capitaded iam a primary care Support caregivers
No	0	0	-	
No	0	0	-	
No	1	0	-	-
No	0	0	-	Support caregivers
No	0	1	-	-
No	0	1	-	-
				Caregivers work very hard to provide quality care and deserve high wages. Please do not take away necessary healthcare.
No	0	0	-	
No	0	1	-	-
No	0	1	-	-
No	0	1	-	-
No	0	1	-	-
No	0	1	-	-
No	1	0	-	-
No	0	1	-	-
No	0	1	-	-
No	0	1	-	-
				Medicare and Medicaid are vital programs for large numbers of Americans.
No	0	0	-	
No	0	1	-	-
No	0	1	-	-

				Turning 79 in November. We seniors keep a close eye on things like this. Especially staying at home and hopefully dying at home. Most importantly, we always vote. The tax cuts raising the deficit and this being used to scale back entitlement programs is a topic of great interest to us. We don't forget friends or enemies.
No	0	0	-	
No	1	0	-	-
No	1	0	-	-
No	1	0	-	-
No	0	1	-	-
No	0	1	-	-
No	0	0	-	I stand with caregivers.
No	0	1	-	-
No	0	1	-	-
No	0	1	-	-
No	1	0	-	-
				there is a group of patients in Puerto Rico that are dual eligible for Medicare Part B and Medicaid but the Medicare regulations.. left outside the possibility to qualify for an Advantage Program. These patient are mainly patients with ESRD. The Medicaid Program in PR has paid the 20% deductible for these patient up to the 2015. Thereafter they have refused to pay for these 20% services by unclear reason. These patient are indigent and they don't have ability to pay for these 20%. In the past I have try to meet with ASES (PR Medicaid Program) to discuss these argument but they argue that I need to negotiate it with the Health Insurances on charge of these Medicaid population. I said that its incorrect that determination since any determination for payments needs approval of the agency and the federal agency concern with the implementation of the Providers contract. Otherwise nobody has said the way we will proceed with the compliance with these Medicare Regulation of the 20%, which I think goes over any local determination. I have previously contact the PR Medicare Office, write a letter to the Chow, but nobody has answer me my questions. I think the PR has received enough money from the Medicaid Program to cover for these services. Otherwise I think is an unfair practice from the Medicare Program to allow
No	0	0	-	

No	0	1	-	-	A complete removal of this section may hinder future growth and development of the self-directed service model. We recommend CMS consider adding regulatory language to allow individuals engaged in a self-directed service model to make a payment to a third party.
No	0	1	Yes	-	
No	0	1	-	-	I agree that Medicare must limit the insurance companies power. Here in Puerto Rico MCS clasicare decrease our payment unilaterally.
No	0	0	-	-	Providing a living wage for caretakers is fair and helps insure that the caretakers will a do a good job.
No	0	0	-	-	
No	0	1	-	-	
No	1	0	-	-	
No	0	1	-	-	
No	1	0	-	-	
No	0	1	-	-	
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No	0	1	-	-	
No	0	1	-	-	
No	0	1	-	-	
No	0	1	-	-	
No	0	1	-	-	Caregivers are an essential need in our society. Get sick and you will find out quickly- and you will get sick. This is a no brainer. \$15 an hour is difficult for a person to pay on their own without help from the government. That too is a no brainer. Tax reform is needed, I think, to prepare for this eventuality we all will face. I suggest taking inventory of this concern thru comments made on our state and federal tax returns. Big data collection of taxpayer spending priorities can be accomplished thru the i.r.s.
No	0	0	-	-	
No	0	1	-	-	

I agree that Medicare must limit the insurance companies power. Here in Puerto Rico MCS clasicare decrease our payment unilaterally. Providing a living wage for caretakers is fair and helps insure that the caretakers will a do a good job.

Caregivers are an essential need in our society. Get sick and you will find out quickly- and you will get sick. This is a no brainer. \$15 an hour is difficult for a person to pay on their own without help from the government. That too is a no brainer. Tax reform is needed, I think, to prepare for this eventuality we all will face. I suggest taking inventory of this concern thru comments made on our state and federal tax returns. Big data collection of taxpayer spending priorities can be accomplished thru the i.r.s.

[illegible]

AMERICAN
OVERSIGHT

Justice for health provider and good management of budget. Good management is that money assigned for a particular line of business is to be apply to that "line of business" . This avoid third parties to use the money in an unassigned way

No	0	0	-	
No	0	1	-	-
No	1	0	-	-
No	0	1	-	-
No	0	1	-	-
No	0	1	-	-
No	0	1	-	-
No	0	1	-	-
No	0	1	-	-
No	0	1	-	-
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Special Codes:
Outside Organization/Individual - 1
Provider Advocacy Group 2
Political- 3
State - 4

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SUPPORT

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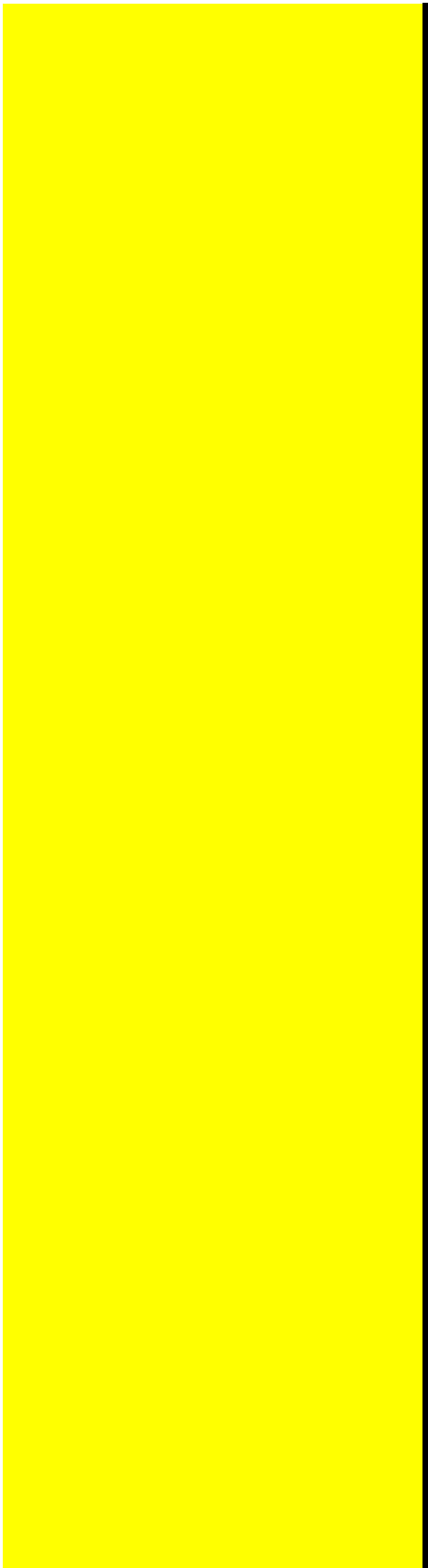
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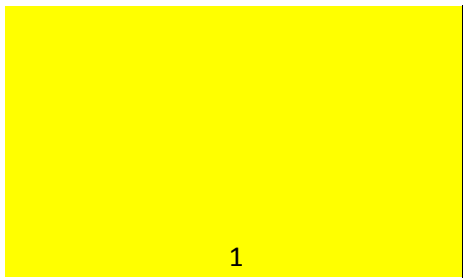
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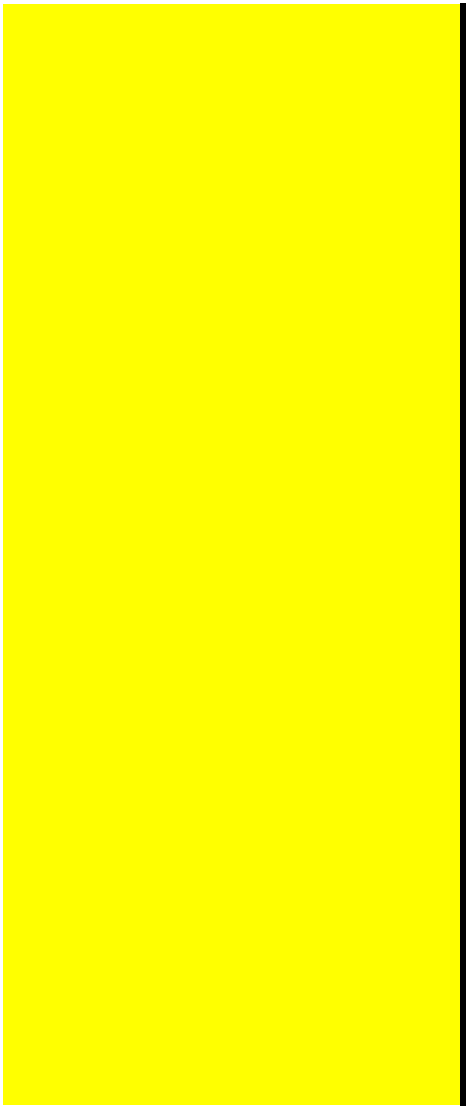
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OPPOSE

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	NEITHER	-	-	-	-
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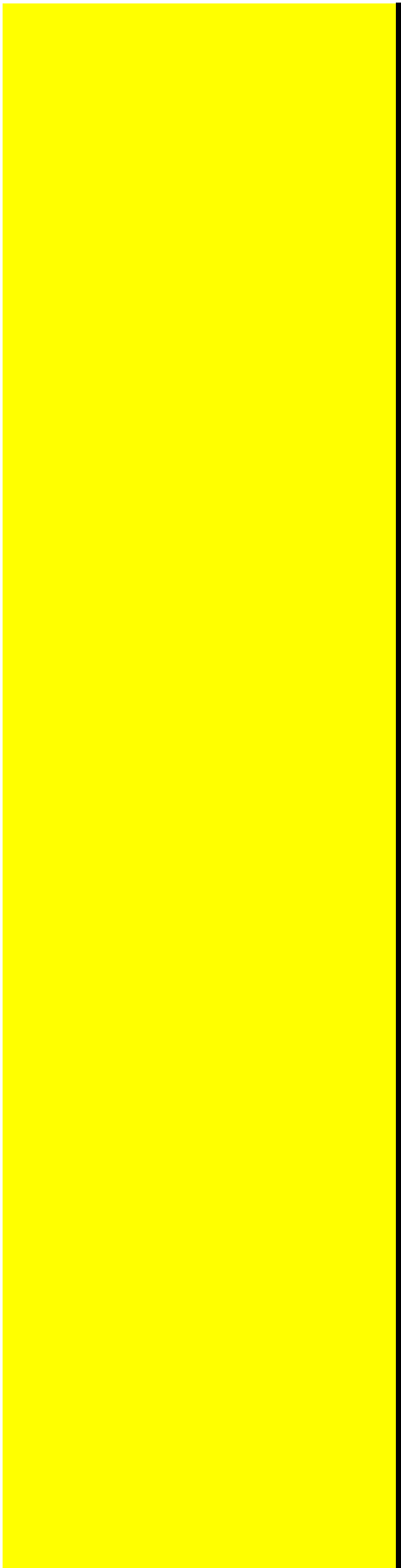
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-	SUPPORT	-	-

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1	-	SUPPORT	-	-
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1	-	OPPOSE	-	-
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SUPPORT

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CMS-2018-0090-6858	Yes	Ciatou	Angelo	CA
CMS-2018-0090-6859	Yes	Cindy	Denny	CA

CMS-2018-0090-6860	Yes	Conche	Bustes	CA
CMS-2018-0090-6861	Yes	Consuelo	Rehder	CA
CMS-2018-0090-6862	Yes	Cruz	Hernandez	CA
CMS-2018-0090-6863	Yes	Cynthia	Wilson	CA
CMS-2018-0090-6864	Yes	D.	Villa Semos	CA
CMS-2018-0090-6925	Yes	Irais	Nonez	CA
CMS-2018-0090-6926	Yes	Inea	Pueutel	CA
CMS-2018-0090-6927	Yes	Individual	Individual	CA
CMS-2018-0090-6928	Yes	Individual	Individual	CA
CMS-2018-0090-6929	Yes	Individual	Individual	CA
CMS-2018-0090-6930	Yes	Individual	Individual	CA
CMS-2018-0090-6931	Yes	Individual	Individual	CA
CMS-2018-0090-6932	Yes	Individual	Individual	CA
CMS-2018-0090-6933	Yes	Individual	Individual	CA
CMS-2018-0090-6934	Yes	Individual	Individual	CA
CMS-2018-0090-6935	Yes	Individual	Individual	CA
CMS-2018-0090-6936	Yes	Individual	Individual	CA
CMS-2018-0090-6937	Yes	Individual	Individual	CA
CMS-2018-0090-6938	Yes	Individual	Individual	CA
CMS-2018-0090-6939	Yes	Individual	Individual	CA
CMS-2018-0090-6940	Yes	Individual	Individual	CA
CMS-2018-0090-6941	Yes	Individual	Individual	CA
CMS-2018-0090-6942	Yes	Individual	Individual	CA
CMS-2018-0090-6943	Yes	Individual	Individual	CA
CMS-2018-0090-6944	Yes	Individual	Individual	CA
CMS-2018-0090-6945	Yes	Individual	Individual	CA
CMS-2018-0090-6946	Yes	Individual	Individual	CA
CMS-2018-0090-6947	Yes	Jorge	Valenzuela	CA
CMS-2018-0090-6948	Yes	Jose	Juavez	CA
CMS-2018-0090-6949	Yes	Jose	Zavala	CA
CMS-2018-0090-6950	Yes	Josetina	Rodriges	CA
CMS-2018-0090-6951	Yes	Joyce	Brungardt	CA
CMS-2018-0090-6952	Yes	Juan	Contreras	CA
CMS-2018-0090-6953	Yes	Justin	Flenner	CA
CMS-2018-0090-6954	Yes	Karen	Vargas	CA
CMS-2018-0090-6955	Yes	Kaye	LaPlant	CA
CMS-2018-0090-6956	Yes	Kristal	Coons	CA
CMS-2018-0090-6957	Yes	Larry	Bishop	CA
CMS-2018-0090-6958	Yes	Laura	Asinas	CA
CMS-2018-0090-6959	Yes	Laura	Rosales	CA
CMS-2018-0090-6960	Yes	Jean	Rezabeck	CA
CMS-2018-0090-6961	Yes	Jeanette	Zarour	CA

CMS-2018-0090-6962	Yes	Jeff	Hall	CA
CMS-2018-0090-6963	Yes	Jessica	Hernandez	CA
CMS-2018-0090-6964	Yes	Jim	Rush	CA
CMS-2018-0090-6965	Yes	Joanne	Waddell	CA
CMS-2018-0090-6966	Yes	Jore	Estrada	CA
CMS-2018-0090-6967	Yes	Lorena	Lara	CA
CMS-2018-0090-6968	Yes	Linda	Zavala	CA
CMS-2018-0090-6969	Yes	Leticia	Lepe	CA
CMS-2018-0090-6970	Yes	Lesley	Ramirez	CA
CMS-2018-0090-6971	Yes	Leonox	Marquez	CA
CMS-2018-0090-6972	Yes	Legereta	Hammond	CA
CMS-2018-0090-6973	Yes	Lawanda	Lyons-Pruitt	CA
CMS-2018-0090-6974	Yes	Laura	Selken	CA
CMS-2018-0090-6975	Yes	Pablo	Corvandez	CA
CMS-2018-0090-6976	Yes	P.	Solorro	CA
CMS-2018-0090-6977	Yes	Obie	Crisp Jr.	CA
CMS-2018-0090-6978	Yes	Nidhal	Shamoun	CA
CMS-2018-0090-6979	Yes	Nawal	Zari	CA
CMS-2018-0090-6980	Yes	Navhizza	Cotz	CA
CMS-2018-0090-6981	Yes	Naima	Kamara	CA
CMS-2018-0090-6982	Yes	Monique	Jaez	CA
CMS-2018-0090-6983	Yes	Mona	Madngod	CA
CMS-2018-0090-6984	Yes	Mona	Castro	CA

Organization	Form Letter?	Total Comments/ Signatures	Comment Matches Pivot Comment on Duplicates Tab? (include Pivot Comment Document ID)	In Support (1 = Yes) (0 =No)	In Opposition (1 = Yes) (0 =No)
Write in Campaign; "I support home care workers"	Yes	106	Y	0	1
Write in Campaign; "I support home care workers"	Yes	107	Y	0	1
Write in Campaign; "I support home care workers"	Yes	114	Y	0	1
Write in Campaign; "I support home care workers"	Yes	100	Y	0	1
Write in Campaign; "I support home care workers"	Yes	166	Y	0	1
Write in Campaign; "I support home care workers"	Yes	123	Y	0	1
Write in Campaign; "I support home care workers"	Yes	121	Y	0	1
Write in Campaign; "I support home care workers"	Yes	154	Y	0	1
Write in Campaign; "I am writing in opposition to proposal# CMS-2413-P"	Yes	14	Y; 532	0	1
Write in Campaign; "As someone who understands the importance of home care services"	Yes	143	Y	0	1
Write in Campaign; Half sheet paper comment	Yes	1	Y	0	1
Write in Campaign; Half sheet paper comment	Yes	1	Y	0	1
Write in Campaign; Half sheet paper comment	Yes	1	Y	0	1
Write in Campaign; Half sheet paper comment	Yes	1	Y	0	1
Write in Campaign; "As someone who understands the importance of home care services"	Yes	99	Y	0	1
Write in Campaign; Half sheet paper comment	Yes	1	Y	0	1

Write in Campaign; Half sheet paper comment	Yes	1	Y	0	1
Write in Campaign; "As someone who understands the importance of home care services"	Yes	99	Y	0	1
Write in Campaign; Half sheet paper comment	Yes	1	Y	0	1
Write in Campaign; Half sheet paper comment	Yes	1	Y	0	1
Write in Campaign; Half sheet paper comment	Yes	1	Y	0	1
Write in Campaign; Half sheet paper comment	Yes	1	Y	0	1
Write in Campaign; Half sheet paper comment	Yes	1	Y	0	1
Write in Campaign; Half sheet paper comment	Yes	1	Y	0	1
Minnesota House of Representatives	No	1	N	0	1

The Fairness Center	No	1	N	1	0
American Income and National Income Lide Insurance	No	1	N	0	1
Housing and Economic Rights Advocates					
Write in Campaign; "I support home care workers"	No	1	N	0	1
Write in Campaign; Half sheet paper comment	Yes	1	Y	0	1
Write in Campaign; Half sheet paper comment	Yes	1	Y	0	1

AMERICAN
OVERSIGHT

Impact on Self-Direct Service Models	Special Considerations (if applicable)	Special Codes: Outside Organization/Individual - 1 Provider Advocacy Group 2 Political- 3 State - 4	NEITHER	SUPPORT
0		1	-	-
0		1	-	-
0		1	-	-
				-
0		1	-	
0		1	-	-
0			-	-
0		1	-	-
0		1	-	-
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				-
0		1	-	
0		1	-	-

0	1	-	-
0	1	-	-
0	1	-	-
0	1	-	-
0	1	-	-
0	1	-	-
0	1	-	-
0	1	-	-
0	3	-	-
<p>NPRM is restrictive on state flexibility.</p> <p>2014 reg did not support Congress intention by allowing reassignment to entities that were not in statute. PA (2015) and 10 other states attempted/succesfully passed Executive Orders/state laws allowing a labor union to serve as the exclusive representative Direct Care Workers. PA Supreme Court has pending case from Fairness Center for two individuals related to PA activities that enabled union to form (as part of SECU and AFSCME) and require orientation training.</p>			
0	1	-	-
0	1	-	-
0	1	-	-
0	1	-	-
0	1	-	-

SUPPORT

0	1	-	-
0	1	-	-
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0	1	-	-

OPPOSE

	TOTAL	
OPPOSE	NEITHER	0
	TOTAL	
OPPOSE	SUPPORT	1
	TOTAL	
OPPOSE	OPPOSE	1451
	TOTAL	
	COMMEN	
	TS WITH	
OPPOSE	PAGES	1452

OPPOSE CHECK 1452

OPPOSE

OPPOSE	# NEITHER	0
	#	
OPPOSE	SUPPORT	1
OPPOSE	# OPPOSE	117
	TOTAL	
	"COMME	
OPPOSE	NTS"	118

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[illegible]

Final # of Posted Comment (Last 4 digits of the Document ID)	Attachment?	Author First Name	Author Last Name	Location (State/ Province)	Organization
1441	No	Alexandria	Marquez	AL	N/A
6721	No	David	Doherty	MO	N/A
2086	No	Loren	Freeman	WA	N/A

Form Letter?	Total Comments/ Signatures	Duplicate?	In Support (1 = Yes) (0 =No)	In Opposition (1 = Yes) (0 =No)	Impact on Self-Direct Service Models
N	1	Y	0	1	0
N	1	Y	1	0	0
N	1	N	1	0	0

Special Considerations (if applicable)	Special Codes: Outside Organization/Individual - 1 Provider Advocacy Group 2 Political- 3 State - 4			
		NEITHER	SUPPORT	OPPOSE
Exact duplicate of 1425 from same individual	1	-	-	OPPOSE
Exact duplicate of 6701 from same individual	1	-	SUPPORT	-
Duplicate of 1901.	1	-	SUPPORT	-

# NEITHER	0
#	
SUPPORT	2
# OPPOSE	1
TOTAL	3
CHECK	3

Final # of Posted Comment (Last 4 digits of the Document ID)	Attachment?	Author First Name	Author Last Name	Location (State/ Province)	Organization
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5802	No	Dennis	Moore	GA	N/A
6590	No	Gerald	Smith	VA	N/A

Form Letter?	Total Comments/Signatures	Duplicate?	In Support (1 = Yes) (0 =No)	In Opposition (1 = Yes) (0 =No)	Summary of Comment (if applicable)

N	1	N	0	0	"Please stop"
---	---	---	---	---	---------------

N	1	N	0	0	"Crooks"
---	---	---	---	---	----------

Justification of Comment Being Out of Scope	Special Considerations (if applicable)	Special Codes: Outside Organization/Individual - 1 Provider Advocacy Group 2 Political- 3 State - 4	
			NEITHER
No interpretable comment.	Originally on Duplicates tab as Pivot Originally on Duplicates tab as	1	NEITHER
No interpretable comment.	Duplicate of Pivot 5802	1	NEITHER

SUPPORT OPPOSE

-

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NEITHER 2

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SUPPORT 0

OPPOSE 0

TOTAL 2

CHECK 2

Totals		
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Total reviewed comments	7977	
Total support	913	11%
Total oppose	6624	83%
Total neither	440	6%
Total check	7977	100%

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Fan, Kristin A. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#)
Subject: PRR Final Rule
Date: Friday, October 19, 2018 12:15:00 PM
Attachments: [CMS-2413-Final Rule \(10-19-18\) clean.doc](#)
[CMS-2413-Final Rule Shell\(10-19-18\) tracked changes.doc](#)

Hi Kristin and Janet,

Attached are clean and tracked-changes copies of the final rule with your edits implemented.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410) 786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: PRR Tool Update
Date: Friday, September 7, 2018 4:10:23 PM
Attachments: [JI_9.10.2018_PPR NPRM Comment Tracking Log.xlsx](#)

Hey Chris,

I figured out how to count the number of uniques and duplicate on each of the tabs by “oppose”, “support”, or “neither” (look after column O on duplicates, uniques, and mail-ins tabs). The uniques tab was easy to break out and calculate, but the duplicate tab was challenging to parse out so I had to do it manually. I am going to see if any of our Excel gurus in the division can help me automate it. I can explain more about what I did on Monday.

I talked to Danielle about the some of mail-ins essentially being duplicates and she suggested first collapsing the mail ins into their own groups (AKA pivots with duplicates) and then trying to match those groupings to the pivots in the de-duplication tool. Then we could get together as a team and try to match the mail-ins to the pivots we each reviewed.

Thanks!
Jocelyn

Final # of Posted Comment (Last 4 digits of the Document ID/Pivot Comment)	Attachment?	Author First Name	Author Last Name	Location (State/Province)	Organization
532	No	Multiple	Multiple	Multiple	Write-in Campaign: CA/AL/NY/DE/WI
2892	Yes	Multiple	Multiple	CA	Teamsters Local Union 186 + Home Care Workers/Bene
2892-2893D	Yes			Multiple (TX, NC, CA, CO, NV)	Parents/Union Members International Brotherhood of Electrical Workers
2505	No	Multiple	Multiple		N/A
2121	Yes	Multiple	Multiple	CA	N/A
3122	No	Multiple	Multiple	MN	N/A
1425	No	Multiple	Multiple	AL	Union Members
2393	No	Multiple	Multiple	Multiple (HI, FL)	N/A
2404	No	Multiple	Multiple	Multiple (TX, FL)	N/A
2920	No	Multiple	Multiple	Multiple WA, NH)	N/A
5796	No	Multiple	Multiple	Multiple (VA, TN)	Voices for Freedom; N/A
6123	No	Multiple	Multiple	PA	N/A
6468	No	Carolyn	Meyer	Multiple (KS, TX)	N/A
6701	No	David	Doherty	MO	N/A

Form Letter?	Total # Duplicate Comments	Duplicate matches Pivot Comment?	In Support (1 = Yes) (0 =No)	In Opposition (1 = Yes) (0 =No)	Impact on Self-Direct Service Models
Y	962	Y	0	1	0
Y	16	Y	0	1	0
			-	-	
N	5	Y	1	0	0
N	3	Y	0	1	0
N	2	Y	1	0	0
N	1	Y	0	1	0
N	1	Y	1	0	0
N	1	Y	1	0	0
N	1	Y	0	1	0
N	1	Y	1	0	0
N	1	Y	0	1	0
N	1	Y	1	0	0
N	1	Y	1	0	0

Special Considerations (if applicable)	Special Codes: Outside Organization/Individual - 1 Provider Advocacy Group - 2 Political- 3
--	---

1

1

Duplicate letter from another union

Extrapolated comment supported
reg.

1

Each comment contains the same
attachement w/ different name.

1

1

100% match from same person
(1441) on oddity tab

1

Extrapolated comment supported
reg.

1

Extrapolated comment supported
reg.

1

Extrapolated comment supported
reg.

1

1

1

Extrapolated comment supported
reg.

1

Extrapolated comment supported
reg.

100% match from same person
(6721) on oddity tab

1

Summary	Total with pivot	NEITHER	SUPPORT
DHHS, I am writing in opposition....	963	-	-
To Whom it may concern, I am writing in opposition...	17	-	-
		-	-
			SUPPORT
Stop union dues skimming.	6	-	
I strongly oppose Proposal# CMS-2413-P. No attacks on home care workers, seniors, and people living with disabilities!	4	-	-
I am writing in support	3	-	SUPPORT
DHHS, I am writing in opposition....	2	-	-
Stop dues skimming.	2	-	SUPPORT
Stop dues skimming.	2	-	SUPPORT
The Trump administration's actions are transparent/Trump appointees are using a federal rulemaking process to weaponize CMS	2	-	-
DHHS and CMS should enact proposed rule CMS-2413-P	2	-	SUPPORT
To Whom It May Concern, I support home care workers and their right to choose to join together in a union	2	-	-
PLEASE ENTER YOUR COMMENT HERE STOP (unions) from robbing care givers!	2	-	SUPPORT
Why would you let Union bosses skim union dues off the top of health care providers. You need to stop this organized corruption.	2	-	SUPPORT

OPPOSE

OPPOSE

NEITHER

0

TOTAL NEITHER

0

OPPOSE

SUPPORT

7

TOTAL SUPPORT

19

-

OPPOSE

6

TOTAL OPPOSE

990

-

TOTAL PIVOTS

13

TOTAL COMMENTS
WITH PIVOT

1009

OPPOSE

1009

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OPPOSE

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OPPOSE

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OPPOSE

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Final # of Posted Comment (Last 4 digits of the Document ID)	Attachment?	Author First Name	Author Last Name	Location (State/Province)
0002	Yes	David	Addington	DC
0003	No	Jorge	Guzman-Ortiz	PR
0004	No	Lee	Shum	PR
0005	No	Angela	Robles	PR
0006	No	Dr.	Ramirez	PR
0007	No	Rafael	Ramirez	PR
0008	No	Geraldo	Gonzlez	PR
0009	No	Vivian	Torres	PR
0010	No	Nivia	Souffront	PR
0011	No	Elsie	Negron	PR
0012	No	Kelvin	Gonzalez	PR
0013	No	Vanessa	Santini	PR
0014	No	David	Carballeira	PR
0015	No	Ramon	Ramirez	FL
0016	No	Carmen	Ceballos	PR

0017	No	Pedro	Bonet	NJ
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0018	No	Jose	Badillo	PR
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0019	No	Noel	Arnau	PR
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0021	No	Cheryl	Taaffe	FL
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0411	No	Patricia	Papai	CA
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0419	No	Blanca	Ramos	CA
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0519	Yes	Gary	Passmore	CA
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0596	No	Mary	Tinker	CA
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0637	No	Ruth	Wooden	CA
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0751	No	Deanna	Wright	CA
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0786	No	Dana	Shilling	NJ
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0810	No	John	McClaghry	VT
------	----	------	-----------	----

0857	No	Cynthia	Bennett	CA
------	----	---------	---------	----

0941	No	Betty	Traynor	CA
------	----	-------	---------	----

0981	No	Nanette	Parratto- Wagner	FL
------	----	---------	---------------------	----

0993	No	Anonymous	Anonymous	WI
------	----	-----------	-----------	----

1275	No	Meg	Hansen	VT
------	----	-----	--------	----

1340	No	Guillermo	Bolaos	PR
------	----	-----------	--------	----

1388	No	Theresa	Bald	DE
------	----	---------	------	----

1402	No	Sandra	McCune	TN
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1423	No	Margaret	Okuzumi	CA
------	----	----------	---------	----

1449	No	Melissa	Barling	CA
------	----	---------	---------	----

1479	No	Iris	Yipp	IL
------	----	------	------	----

1503	No	Diane	Ballou	VT
------	----	-------	--------	----

1531	Yes	Madeline	Offerman	CA
CMS-2018-0090-1535	No	Elana	Buch	IA
CMS-2018-0090-1564	No	Rosalie	Calhoun	NV
CMS-2018-0090-1569	No	Richard	Wells	LA

CMS-2018-0090-1570	Yes	Caitlin	Connolly	DC
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CMS-2018-0090-1597	Yes	Roger	Klein	OH
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CMS-2018-0090-1600	No	Robert	Boada	PR
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CMS-2018-0090-1606	No	Julie	Dupr	MN
CMS-2018-0090-1607	No	Felix	Ruiz	PR
CMS-2018-0090-1608	Yes	Scott	Coffin	CA
CMS-2018-0090-1610	No	Robert	Sojo	PR

CMS-2018-0090-1612	Yes	Melody	Benjamin	DC
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CMS-2018-0090-1613	Yes	Xavier	Becerra	CA
CMS-2018-0090-1615	No	Armando	Tristani	PR
CMS-2018-0090-1620	No	Raul	Torres	PR
CMS-2018-0090-1621	No	Leigh	Campbell-Hale	CO
CMS-2018-0090-1623	No	Ruth	Needleman	IN
CMS-2018-0090-1625	No	Harold	Garrett-Goodyear	MA
CMS-2018-0090-1626	No	Srilakshmi	Vankina	MN
CMS-2018-0090-1627	No	Luis	Cummings	PR
CMS-2018-0090-1628	No	Jennifer	Guglielmo	MA
CMS-2018-0090-1629	No	Peter	Shapiro	CA

CMS-2018-0090-1630	No	Henry	Himes	OH
CMS-2018-0090-1631	No	Sarah	Leyrer	WA
CMS-2018-0090-1634	No	Barbara	Gabriel	NY
CMS-2018-0090-1635	No	John	Lawrence	NY
CMS-2018-0090-1636	No	Karen	Miller	NY
CMS-2018-0090-1638	No	Erik	Freas	NY
CMS-2018-0090-1639	No	Ben	Lipkin	NJ
CMS-2018-0090-1640	No	James	Davis	NY
CMS-2018-0090-1641	No	Lando	Storrs	IA
CMS-2018-0090-1642	No	David	bates	IL
CMS-2018-0090-1649	No	Ian	Ringgenberg	MN
CMS-2018-0090-1650	No	David	Arnow	NY
CMS-2018-0090-1652	No	Marc	Kagan	NY

CMS-2018-0090-1658	No	Anh	Tran	NY
CMS-2018-0090-1660	No	Martin	Halpern	WI
CMS-2018-0090-1668	No	Jen	Estruth	NY
CMS-2018-0090-1670	No	Patrick	Ishmael	MO
CMS-2018-0090-1671	No	Steven	Kreisberg	DC
CMS-2018-0090-1677	No	Bob	Rossi	OR

CMS-2018-0090-1684	No	Staci	Anonymous	MN
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CMS-2018-0090-1685	No	Sandra	Guillebeaux	AL
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CMS-2018-0090-1697	No	Rudi	Batzell	IL
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CMS-2018-0090-1704	No	John	Metzgar	IL
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CMS-2018-0090-1725	No	Margaret	Roisum	WA
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CMS-2018-0090-1727	No	Stacy	Kono	CA
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CMS-2018-0090-1728	No	Jeanne	Kellner	WA
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CMS-2018-0090-1730	No	Anonymous	Anonymous	WA
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CMS-2018-0090-1732	No	Peter	Cole	IL
CMS-2018-0090-1736	No	Sharon	Furlong	PA
CMS-2018-0090-1742	No	Roberta	Lie	MA
CMS-2018-0090-1749	No	William	Matos	PR
CMS-2018-0090-1750	No	Theresa	Case	TX
CMS-2018-0090-1751	No	Anonymous	Anonymous	PR

CMS-2018-0090-1752	No	Manuel	Medina	PR
CMS-2018-0090-1753	No	A	Ortiz	PR
CMS-2018-0090-1754	No	Francisco	Leal	PR

CMS-2018-0090-1755	No	William	Hurtado	PR
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CMS-2018-0090-1760	No	Ed and Joy	Smith	WA
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CMS-2018-0090-1762	No	Felix	SCHMIDT	PR
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CMS-2018-0090-1766	No	Bill	Rosenthal	NY
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CMS-2018-0090-1767	No	Robyn	Muncy	MD
CMS-2018-0090-1770	No	Lilia	Fernandez	NJ

CMS-2018-0090-1772	No	John	Curtis	DC
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CMS-2018-0090-1773	No	Pete	Anonymous	MN
CMS-2018-0090-1777	No	Anonymous	Anonymous	WA
CMS-2018-0090-1780	No	Linda	Murphy	OR
CMS-2018-0090-1781	No	Anonymous	Anonymous	OR
CMS-2018-0090-1782	Yes	Christina	Suggett	CA
CMS-2018-0090-1783	Yes	Lisa	Nelson	VA
CMS-2018-0090-1789	Yes	Josh	Nace	CA
CMS-2018-0090-1792	No	Anonymous	Anonymous	PR

CMS-2018-0090-1793	Yes	Ashley	Varner	VA
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CMS-2018-0090-1794	No	Timothy	Bartley	MO
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CMS-2018-0090-1795	No	Lorna	Zukas	CA
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CMS-2018-0090-1798	No	Linda	Hyatt	WA
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CMS-2018-0090-1799	No	Jim	Vokal	NE
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CMS-2018-0090-1800	Yes	Ron	Johnson	DC
CMS-2018-0090-1801	No	Anonymous	Anonymous	PR
CMS-2018-0090-1802	No	Claire	Knierim	WA
CMS-2018-0090-1803	No	Paul	Gessing	NM

CMS-2018-0090-1804	Yes	Brent	Gardner	VA
CMS-2018-0090-1805	No	Anonymous	Anonymous	WA

CMS-2018-0090-1806	No	Chris	Tilly	CA
CMS-2018-0090-1807	No	Anonymous	Anonymous	PR

CMS-2018-0090-1808	No	Miranda	Thorpe	WA
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CMS-2018-0090-1809	No	Elaine	Dunlap	WA
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CMS-2018-0090-1810	No	Michael	Jahr	WI
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CMS-2018-0090-1811	Yes	Tamara	Jackson	WI
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CMS-2018-0090-1812	Yes	Douglas	Seaton	MN
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CMS-2018-0090-1814	No	Kristina	Rasmussen	FL
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CMS-2018-0090-1817	No	Matthew	Finnell	WA
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CMS-2018-0090-1818	Yes	Mark	Schoesler	WA
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CMS-2018-0090-1819	Yes	Randi	Becker	WA
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CMS-2018-0090-1821	No	Martin	Gorrochategui	PR
CMS-2018-0090-1822	No	William	Easton	FL
CMS-2018-0090-1824	No	Eileen	Reed	PA

CMS-2018-0090-1825	No	gail	friedman	PA
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CMS-2018-0090-1826	No	OSCAR	cardona	PR
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CMS-2018-0090-1828	No	Bethany	Marcum	AK
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CMS-2018-0090-1832	No	Juan	Gonzalez	CA
CMS-2018-0090-1838	No	Megan	Marks	WA
CMS-2018-0090-1840	No	Anonymous	Anonymous	WA
CMS-2018-0090-1841	No	Bridgette	McCoy	WA
CMS-2018-0090-1850	No	Chelsea	Markovich	WA
CMS-2018-0090-1852	No	Pennie	Knott	WA
CMS-2018-0090-1853	No	Jennifer	Dickson	WA
CMS-2018-0090-1857	Yes	Eileen	Boris	CA
CMS-2018-0090-1887	No	Mary	Feist	WA
CMS-2018-0090-1889	No	Parker	Snider	AL
CMS-2018-0090-1891	No	Carla	Wal	WA
CMS-2018-0090-1892	No	Craig	Jones	WA

CMS-2018-0090-1893	Yes	Mike	Padden	WA
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CMS-2018-0090-1895	No	Anonymous	Anonymous	MA
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CMS-2018-0090-1896	Yes	Anonymous	Anonymous	NC
CMS-2018-0090-1897	No	Jean	Freeman	WA
CMS-2018-0090-1898	No	Julene	Weaver	WA
CMS-2018-0090-1899	Yes	David	Addington	DC

CMS-2018-0090-1900	Yes	Kristine	Loomis	CA
CMS-2018-0090-1901	No	Loren	Freeman	WA
CMS-2018-0090-1902	No	Dawn	Morris	WA

CMS-2018-0090-1903	Yes	Nan	Brasmer	CA
CMS-2018-0090-1904	Yes	Judy	Wilkinson	CA
CMS-2018-0090-1905	No	Anonymous	Anonymous	WA
CMS-2018-0090-1907	No	Linda	Wasserman	WA
CMS-2018-0090-1908	No	Patricia	Wild	WA
CMS-2018-0090-1940	No	Thomas	Street	WA
CMS-2018-0090-1951	No	Dan	Ryan	WA
CMS-2018-0090-1960	No	Phyllis	Dolph	WA
CMS-2018-0090-2003	No	Katie	Woodland	WA
CMS-2018-0090-2011	No	Anonymous	Anonymous	WA
CMS-2018-0090-2023	No	Latricia	Sanchez	CA
CMS-2018-0090-2024	No	Ryan	Riedal	MI
CMS-2018-0090-2026	No	John	Strup	NC
CMS-2018-0090-2027	No	Bill	Webster	AZ
CMS-2018-0090-2028	No	Roy	Longuet	TX
CMS-2018-0090-2029	No	DeWayne	Crater	WA
CMS-2018-0090-2030	No	Dean	Wilkey	VA
CMS-2018-0090-2032	No	Bruce	Barott	MN
CMS-2018-0090-2033	No	Susan	Carson	TX
CMS-2018-0090-2034	No	Joan	Murbach	AZ
CMS-2018-0090-2037	No	Janet	Ulmer	IL
CMS-2018-0090-2038	No	John	Oneil	OH
CMS-2018-0090-2039	No	David	Coeur	CA
CMS-2018-0090-2041	No	Grace	gabrielsen	IA
CMS-2018-0090-2042	No	Nancy	Ordowski	AZ
CMS-2018-0090-2044	No	Michael	Bellinger	UT
CMS-2018-0090-2045	No	Sue	Fowler	MI
CMS-2018-0090-2046	No	Madeline	Jones	GA
CMS-2018-0090-2047	No	Annemarie	Maynard	CO
CMS-2018-0090-2048	No	Wayne	Landry	FL
CMS-2018-0090-2049	No	Brett	Layser	UT
CMS-2018-0090-2050	No	Sandra	Stake	CA
CMS-2018-0090-2051	No	Tod	bartholomew	MI
CMS-2018-0090-2052	No	Marc	Jeric	NV
CMS-2018-0090-2053	No	Virigina	lange	VA
CMS-2018-0090-2054	No	Terri	Barnhart	OR
CMS-2018-0090-2055	No	Paula	Kellar	PA
CMS-2018-0090-2056	No	Debra	Clayton	MI
CMS-2018-0090-2057	No	Ralph	patch	AZ
CMS-2018-0090-2058	No	Epifanio	Cruz	AL

CMS-2018-0090-2059	No	Ron	Roberds	UT
CMS-2018-0090-2060	No	Anonymous	Anonymous	WA
CMS-2018-0090-2065	No	Katherine	Paul	WA
CMS-2018-0090-2067	No	Ana	Avellanet	PR

CMS-2018-0090-2068	No	Kaylo-Alexis	Alvarez	WA
CMS-2018-0090-2069	No	Multiple	Multiple	DC
CMS-2018-0090-2070	No	Monica	Anonymous	WA
CMS-2018-0090-2071	No	Deanna	Kettwig	WA
CMS-2018-0090-2077	No	Edward	Neumann	WA
CMS-2018-0090-2082	No	Anonymous	Anonymous	PR

CMS-2018-0090-2083	Yes	Kimberly	Crockett	MN
CMS-2018-0090-2084	No	Anonymous	Anonymous	WA
CMS-2018-0090-2085	No	Guy	Coe	WA
CMS-2018-0090-2088	No	Al	DeKruif	MN
CMS-2018-0090-2089	No	Chris	Naticchia	CA
CMS-2018-0090-2091	No	Kris	Greene	MN
CMS-2018-0090-2092	No	karl	Peterjohn	KS
CMS-2018-0090-2095	No	Daravadee	Mann	WA
CMS-2018-0090-2096	No	Brittany	Hampton	WA
CMS-2018-0090-2097	No	Rhonda	Parker	WA
CMS-2018-0090-2098	No	Yesenia	Avelar	WA
CMS-2018-0090-2101	No	Regina	Denton	WA
CMS-2018-0090-2102	No	Anonymous	Anonymous	WA
CMS-2018-0090-2103	No	Sandra	Lund	WA

CMS-2018-0090-2104	Yes	Laurel	Mildred	CA
CMS-2018-0090-2112	No	Billie	Whittle	WA

CMS-2018-0090-2115	Yes	Fred	Barrows	MA
CMS-2018-0090-2117	Yes	Jose	Felix	CA
CMS-2018-0090-2123	Yes	Lcediuina	Garcia	CA

CMS-2018-0090-2124	Yes	Jeffery	Smith	CA
CMS-2018-0090-2125	No	Linda	Griffin	FL
CMS-2018-0090-2126	No	Tiothy	Spong	DE
CMS-2018-0090-2127	No	Debbie	Sorensen	ND
CMS-2018-0090-2128	No	Leah	Helmer	NY
CMS-2018-0090-2129	No	Esther	Smith	WA
CMS-2018-0090-2131	No	Morris	Whitwer	KY
CMS-2018-0090-2132	No	Donna	Doran	MN
CMS-2018-0090-2134	No	Barbara	Bowen	ME
CMS-2018-0090-2135	No	Billie	McClune	CA
CMS-2018-0090-2136	No	Debra	Estridge	KY
CMS-2018-0090-2137	No	Nancy	Kogan	AZ
CMS-2018-0090-2138	No	Donna	Moss	CA
CMS-2018-0090-2139	No	Edward	Sebastian	MD
CMS-2018-0090-2140	No	Michael	Dielo	CA
CMS-2018-0090-2141	No	Dustin	Granger	TX
CMS-2018-0090-2142	No	Suzanne	Sabadash	FL
CMS-2018-0090-2143	No	Leo	Longtin	AZ
CMS-2018-0090-2144	No	Wenjing	Lin	CA

CMS-2018-0090-2146	No	Nancy	Peters	FL
CMS-2018-0090-2147	No	Susan	Skinner	TX
CMS-2018-0090-2148	No	Elizabeth	Sams	NC
CMS-2018-0090-2149	No	Jeannine	Mootz	TX
CMS-2018-0090-2150	No	Kathy	Taylor	TX
CMS-2018-0090-2151	No	Auke	Hart	MO
CMS-2018-0090-2152	No	William	Price	CA
CMS-2018-0090-2153	No	Sally	Rogers	TN
CMS-2018-0090-2154	No	Bonnie	Kaiser	MT
CMS-2018-0090-2155	No	Rodney	Crites	MI
CMS-2018-0090-2157	No	Peter	Elredge	ME
CMS-2018-0090-2158	No	Karen	Rowe	GA
CMS-2018-0090-2159	No	Steve	Grimes	TX
CMS-2018-0090-2161	No	Margaret	Lyons	CA
CMS-2018-0090-2162	No	Kayleigh	Somers	WA
CMS-2018-0090-2164	No	Sherry	Norquist	VA
CMS-2018-0090-2165	No	Barb	Brown	KS
CMS-2018-0090-2167	No	Tay	Norquist	VA
CMS-2018-0090-2168	No	John	Inks	CA
CMS-2018-0090-2169	No	Albert	Simpson	FL
CMS-2018-0090-2170	No	Glenda	Taton-Allen	CO
CMS-2018-0090-2171	No	James	Scheuer	CA
CMS-2018-0090-2173	No	Sean	Dulaney	WA
CMS-2018-0090-2175	No	Myrna	Anderson	UT
CMS-2018-0090-2176	No	Elaine	Schuler	MD
CMS-2018-0090-2179	No	Sue	Buther	NC
CMS-2018-0090-2180	No	Lorraine	Brown	SC
CMS-2018-0090-2181	No	Eric	Hopkins	ID
CMS-2018-0090-2183	No	Ross	Crow	SC
CMS-2018-0090-2184	No	David	Drake	TX
CMS-2018-0090-2185	No	Dianne	Nelson	OH
CMS-2018-0090-2186	No	Richard	Knodel	OH
CMS-2018-0090-2187	No	Joseph	DuBois	VA
CMS-2018-0090-2189	No	Nancy	Armstrong	OR
CMS-2018-0090-2190	No	Paul	Feeser	TX
CMS-2018-0090-2191	No	Leo	Garry	MO
CMS-2018-0090-2192	No	Walter	Dany	SC
CMS-2018-0090-2193	No	Larry	McCarthy	OH
CMS-2018-0090-2194	No	Elizabeth	Parker	MI
CMS-2018-0090-2196	No	Catherine	Gavend	CO

CMS-2018-0090-2197	No	John	Casey	NE
CMS-2018-0090-2198	No	William	Ackley	AZ
CMS-2018-0090-2199	No	Brad	Folkedahl	IA
CMS-2018-0090-2200	No	Walter	Bunyea	VA
CMS-2018-0090-2201	No	Edward	Lachut	AL

Organization	Form Letter?	Total # Comments/ Signatures	Duplicate?	In Support (1 = Yes) (0 =No)	In Opposition (1 = Yes) (0 =No)
National Federation of Independent Business	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	0	0
N/A	N	1	N	0	0
N/A	N	1	N	0	0
Sanlazarger medical	N	1	N	0	0
Consolidated Radiology Complex, CSP	N	1	N	0	0
SIGNET PUERTO RICO, LLP	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
Colegio de Mdicos Cirujanos de Puerto Rico	N	1	N	1	0
	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
Oficina Dra. Carmen D Irizarry	N	1	N	1	0

N/A	N	1	N	0	0
Dr Jose Badillo Hernandez Office, Hostos Medical service, Solidarity MSO, Procure health alliance	N	1	N	1	0
N/A	N	1	N	1	0
Freedom Works	N	1	N	1	0
N/A	Y	1	Y	0	1
N/A	Y	1	Y	0	1
Congress of California Seniors	N	1	N	0	1
Public Authority by Sourcewise	N	1	N	0	1
N/A	N	1	N	1	0
N/A	Y	1	Y	0	1
Elder Law/Care Communications, Inc.	N	1	N	0	1
Ethan Allen Institute	N	1	N	1	0
N/A	N	1	N	0	0
Senior and Disability Action	Y	1	Y	0	1
N/A	N	1	Y	1	0
N/A	N	1	N	0	0

Vermonters for Health Care
Freedom

N 1 N 1 0

COLEGIO DE MEDICOS Y
CIRUJANOS DE PUERTO RICO

N 1 N 1 0

N/A N 1 N 1 0

N/A N 1 N 0 1



N/A Y 1 Y 0 1

IHHS Public Authority

N 1 N 0 1

N/A N 1 N 0 1

EAI N 1 N 1 0

UCLA	N	1	N	0	1
University of Iowa	N	1	N	0	1
N/A	N	1	N	1	0
N/A	N	1	N	1	0

National Employment Law
 Project
 Action NC
 AFL-CIO
 Amara Legal Center
 American Civil Liberties Union
 American Federation of State,
 County and Municipal
 Employees (AFSCME)
 Americans for Democratic
 Action (ADA)
 Arkansas Community
 Organizations
 Asian Pacific American Labor
 Alliance (APALA)
 Autistic Self Advocacy Network
 Battle Born Progress
 California In-Home Supportive
 Services Consumer Alliance
 Caring Across Generations
 Center for American Progress
 Center for Community Change
 Action
 Center for Law and Social Policy
 (CLASP)
 Center for Medicare Advocacy
 Center for Popular Democracy
 Center for Public
 Representation

N

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N

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N/A

N

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N/A

N

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N

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MN PCA Campaign	N	1	N	1	0
N/A	N	1	N	1	0
Alameda Alliance for Health (managed care health plan in CA)	N	1	N	0	1
N/A	N	1	N	1	0
Union member (Service Employees International Union (SEUI) in IL, IN, MO, and KS)	N	1	N	0	0

State of California Office of the
Attorney General
Premier Anesthesia Consultants,
PSC

N

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N

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N

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College of Physicians and
Surgeons

N

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N

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N/A

N

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N

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Labor and Working-Class History
Association (LAWCHA)

N

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N

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N/A

N

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N/A

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N/A	N	1	N	0	1
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N/A	N	1	N	0	1
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N/A	N	1	N	0	1
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N/A	N	1	N	0	1
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N/A	N	1	N	0	1
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N/A	N	1	N	0	1
N/A	N	1	N	0	1

N/A	N	1	N	0	1
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N/A	N	1	N	0	1
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N/A	N	1	N	0	1
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N/A	N	1	N	0	1
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N/A	N	1	N	0	1
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N/A	N	1	N	0	1
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N/A	N	1	N	0	1
N/A	N	1	N	0	1
N/A	N	1	N	0	1

Show Me Institute	N	1	N	1	0
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AFSCME	N	1	N	0	0
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N/A	N	1	N	0	1
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N/A	N	1	N	1	0
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Union Member	N	1	N	0	1
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N/A	N	1	N	0	1
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N/A	N	1	N	0	1
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N/A	N	1	N	1	0
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Hand in Hand: The Domestic Employers Network	N	1	N	0	1
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optouttoday.com	N	1	N	1	0
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N/A	N	1	N	1	0
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N/A	N	1	N	0	1
N/A	N	1	N	0	1
Union Member (SEIU)	N	1	N	0	1
N/A	N	1	N	0	0
N/A	N	1	N	0	1
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0

N/A	N	1	N	1	0
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N/A	N	1	N	1	0
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COSSMA	N	1	N	1	0
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N/A	N	1	N	0	1
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N/A	N	1	N	0	1
N/A	N	1	N	0	1

N/A	N	1	N	0	1
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MNPAC	N	1	N	1	0
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N/A	N	1	N	1	0
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N/A	N	1	N	1	0
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N/A	N	1	N	1	0
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SIMNSA Health Plan	N	1	N	0	1
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American Legislative Exchange Council (ALEC)	N	1	N	1	0
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Dental Health Services	N	1	N	0	1
N/A	N	1	N	1	0

ALEC Action	N	1	N	1	0
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N/A	N	1	N	0	1
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N/A	N	1	N	0	1
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N/A	N	1	N	1	0
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Plattee Institute	N	1	N		
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US Senate	N	1	N	1	0
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Colegio de mdicos	N	1	N	1	0
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N/A	N	1	N	1	0
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Rio Grande Foundation	N	1	N	1	0
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Americans for Prosperity	N	1	N	1	0
N/A	N	1	N	1	0

N/A	N	1	N	0	1
N/A	N	1	N	1	0

N/A	N	1	N	1	0
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N/A	N	1	N	1	0
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N/A	N	1	N	1	0
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Survival Coalition	N	1	N	0	1
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MNPCA Attorney (Seaton,
Peters & Revnew, P.A.)

N

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N

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Opportunity Solutions Project

N

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N

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N/A

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Washington State Senate	N	1	N	1	0
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Washington State Senate	N	1	N	1	0
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N/A	N	1	N	0	0
N/A	N	1	N	0	0
N/A	N	1	N	0	1

N/A	N	1	N	0	1
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N/A	N	1	N	1	0
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Alaska Policy Forum	N	1	N	1	0
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N/A	N	1	N	0	1
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
University of California, Santa Barbara	N	1	N	0	1
Freedom Caucus	N	1	N	1	0
Alabama Policy Institute	N	1	N	1	0
N/A	N	1	N	0	1
N/A	N	1	N	0	0

Washington State Senate	N	1	N	1	0
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N/A	N	1	N	0	0
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National Employment Law Project					
Action NC					
AFL-CIO					
Amara Legal Center					
American Civil Liberties Union					
American Federation of State, County and Municipal Employees (AFSCME)					
Americans for Democratic Action (ADA)					
Arkansas Community Organizations					
Asian Pacific American Labor Alliance (APALA)					
Autistic Self Advocacy Network					
Battle Born Progress					
California In-Home Supportive Services Consumer Alliance					
Caring Across Generations					
Center for American Progress					
Center for Community Change Action					
Center for Law and Social Policy (CLASP)					
Center for Medicare Advocacy					
Center for Popular Democracy					
Center for Public Representation	N	1	Y	0	0
N/A	N	1	N	1	0
N/A	N	1	N	0	1
National Federation of Independent Business	N	1	N	1	0
Beneficiary of Home Care Services	N	1	N	0	1
N/A	N	1	N	1	0
N/A	N	1	N	1	0

California Alliance for Retired
Americans

N 1 N 0 1

California Council of the Blind

N 1 N 0 1

N/A N 1 N 1 0

N/A N 1 N 0 1

N/A N 1 N 0 1

N/A N 1 N 1 0

N/A N 1 N 0 1

N/A N 1 N 0 1

N/A N 1 N 0 1

N/A N 1 N 0 1

N/A N 1 N 0 1

N/A N 1 N 1 0

N/A N 1 N 1 0

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N/A N 1 N 1 0

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N/A N 1 N 1 0

	N/A	N	1	N	1	0
	N/A	N	1	N	1	0
	N/A	N	1	N	0	1
	N/A	N	1	N	1	0
	N/A	N	1	N	0	1
United States Congress		N	1	N	0	1
	N/A	N	1	N	0	1
	N/A	N	1	N	0	1
	N/A	N	1	N	0	1
	N/A	N	1	N	0	0
Center of the American						
Experiment		N	1	N	1	0
SEUI 755		N	1	N	0	1
SEUI 755		N	1	N	0	1
Retired State Senator		N	1	N	1	0
	N/A	N	1	N	0	1
	N/A	N	1	N	1	0
	N/A	N	1	N	1	0
SEUI 755		N	1	N	0	1
SEUI 755		N	1	N	0	1
SEUI 755		N	1	N	0	1
SEUI 755		N	1	N	0	1
	N/A	N	1	N	0	1
	N/A	N	1	N	0	1
SEUI 755		N	1	N	0	1

CALIFORNIA COLLABORATIVE
FOR LONG-TERM
SERVICES & SUPPORTS
SEUI 755

N	1	N	0	1
N	1	N	0	1

Massachusetts House of
Representatives
N/A
N/A

N	1	N		
N	1	N	0	1
N	1	N	0	1

County of Santa Clara	N	1	N	0	1
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0

N/A	N	1	N	0	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0
N/A	N	1	N	1	0

Impact on Self-Direct Service Models	Special Considerations (if applicable)	Special Codes: Outside Organization/Individual - 1 Provider Advocacy Group 2 Political- 3
0	NPRM aligns with statute and 2014 reg did not.	1
0	References insurance companies.	1
0	References issues in Medicare Advantage.	1
0	Refers to funds used on kids.	1
0	References insurance companies and challenges of doctors in PR.	1
0	References insurance companies.	1
0	References issues in Medicare Advantage.	1
0	References issues in Medicare Advantage.	1
0		1
0	Extrapolated opposition/support from comment.	1
0	Extrapolated opposition/support from comment.	1
0		1
0		1
0		1
0	Extrapolated opposition/support from comment.	1
0	References insurance companies.	1

	General comments about working conditions.	
0	References insurance companies	1

0	Extrapolated opposition/support from comment.	1
0		1

0	Stop skimming union dues. Duplicate of 0981.	1
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0	Part of CA Write In Campaign; more unique text than similarity	1
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0	Part of CA Write In Campaign; more unique text than similarity	1
---	--	---

0	Also, requested extension of 30 day comment period.	1
---	---	---

0		
0		1

0	Part of CA Write In Campaign; more unique text than similarity	1
---	--	---

0		1
---	--	---

	State laws allow state to deduct voluntary contributions from union members to unions Political Action Funds and union dues.	
0		1

0	Complaints about Medicaid not being available in county and issues with SSA	1
---	---	---

0	Part of CA Write In Campaign; more unique text than similarity	1
---	--	---

0	Stop skimming union dues. Duplicate of 0021.	1
---	--	---

0	Alternative suggestion to match 1902(a)(32)(B) that permits assignment to governmental agency or non-governmental agency.	1
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0	Claims 11 states illegal skims dues. VT passed collective bargaining agreement (ED: 7/1/2018) that state can subtract 2% from home care workers if they elect to join union Extrapolated opposition/support from comment.	1
0	References insurance companies. Questions on how caregivers are public employees. Extrapolated opposition/support from comment.	1
0		

Part of CA Write In Campaign; more unique text than similarity
Indicated major issues of adopt this rule (dramatically rewrite the current Medicaid statute, would disallow longstanding practices (deductions from their own wages for voluntary union dues and health insurance coverage) adopted by many states, home care workers in jeopardy of losing their health coverage....Home care jobs ...come with customary benefits like health insurance help reduce turnover, and guarantee consistent quality services.

0		1
1	From IHHS provider: eliminating voluntary deductions will cancel her participation in group health insurance that is otherwise unaffordable Rule will harm home care workers that prevent people from going into institutions that save government money. Extrapolated opposition/support from comment.	1
0		1

Make it harder to join/pay union.
Home health care workers may be
abused without union to protect
them.

Survey research on home care
workers from National Employment
Law Project that details how unions
help home health care workers. Part
time work necessitates additional
jobs. Low pay. Few benefits.

1 Workers are primarily women of
color.

1

1 Rule will harm home care workers
that prevent people from going into
institutions that save government
money.

Recommended voluntary joining of
unions and money should go to
home care workers to provide care.
Rule will harm home care workers
that prevent people from going into
institutions that save government
money.

1 Unions are criminal.

0

Extend 30 daycomment period.
Under section 2(b) of Executive
Order 13563, Improving Regulation
and Regulatory Review, the
Department must afford the public a
meaningful opportunity to
commentwith a comment period
that should generally be at least 60
days.

2014 Reg was 60 days.

Reg impacts at least 11 states.

- | | | |
|---|---|---|
| 0 | Issue with lack of economic analysis.
Original 2014 regulation was passed
without HHS having proper
authority and does not align with
statute passed by Congress.
Economic impact estimates: states
have become dues collectors that
deduct \$1000/year from
independent in-home health
workers for a total of \$1.4 billion
(since passing of 2014 regulation?),
including \$150 million in 2017. | 2 |
|---|---|---|

- | | | |
|---|---|---|
| 0 | References Medicare Advantage and
IPAs and challenges of doctors in PR | 1 |
|---|---|---|

	<p>Campaign to decertify the SEIU as it pertained to the questionable certification to unionize Personal Care Attendants (PCAs) in Minnesota.</p> <p>State doesn't track amount reassigned to third parties.</p> <p>SEUI takes 3% out of Medicaid stipends of PCAs; estimated \$71 million total.</p>	
1	Coercive tactics by union to get certified and sign up members	2
0		1
0	<p>Rule will endanger ability of home care workers to get health insurance because premiums are deducted from payroll.</p>	1
0	<p>References insurance companies. Commenter is member of union that many commenters have called out as problematic or being a member of.</p> <p>Extend 30 day comment period. Under section 2(b) of Executive Order 13563, Improving Regulation and Regulatory Review, the Department must afford the public a meaningful opportunity to comment with a comment period that should generally be at least 60 days.</p> <p>No explanation for 30 day comment period and issue with lack of economic analysis and how many states do reassign payment.</p>	
0		1

0	No data to support assertion that Medicaid funds are being improperly used/diverted. No explanation for 30 day comment period and issue with lack of economic analysis. Rule will intrude on state sovereignty and impair CA law that allows collective bargaining for home care workers.	3
0		1
0	Extrapolated opposition/support from comment.	1
0		1
0		
0		1
0		1
0	References Medicare Advantage and IPAs and challenges of doctors in PR CMS is singling out unions as the only example of a practice that would be impacted by eliminating this provision. No data to support assertion that Medicaid funds are being improperly used/diverted NPRM exacerbates issues employing home care workers and their important service role. Issue cuts across political lines and should not be subject to ideological biases.	1
0		1

0	Anti-union tactic	1
0	NPRM is improper use of regulation to attack workers' right to collectively bargain.	1
0	Attack on rights.	1
0	Unions enable works to get health insurance, worker's comp, standard rule, paid sick.	1
0	Attack on rights.	
0	Unionization has reduced turnover and improved the care relation and the reliability of care services. That is why states have chosen to engage in collective bargaining with these workers.	1
0	Attack on rights/union.	
0	Fast tracking rule. Standard practice for proposed federal rule changes is to allow for a 60-day open comment period before the proposal can be implemented.	1
0	Attack /undermine unions.	
0	No data to support assertion that Medicaid funds are being improperly used/diverted.	1
0	Attack on rights/obstructing worker's legal right to join unions.	1
0	Attck on rights.	1
0	Attack on rights/unions.	1
0	Attack on rights.	1
0	Suggested violation of 1st amendment to have the right to join and support a union.	1

	Fast tracking rule. Standard practice for proposed federal rule changes is to allow for a 60-day open comment period before the proposal can be implemented.	
	Unions enable works to get health insurance, worker's comp, standard rule, paid sick.	
	Unionization has reduced turnover and improved the care relation and the reliability of care services. That is why states have chosen to engage in collective bargaining with these workers.	1
0		1
1		1
	No evidence of reassignment in MO, but nothing prohibiting it.	
	Government obligated to ensure stewardship and allowing reassignment violates government duties.	
0	Wants an end to dues skimming.	1
	Union many commenters have called out as problematic or being a member of.	
	Extend 30 daycomment period.	
	Under section 2(b) of Executive Order 13563, Improving Regulation and Regulatory Review, the Department must afford the public a meaningful opportunity to commentwith a comment period that should generally be at least 60 days.	
	2014 Reg was 60 days.	
0	No explanation for 30 day comment period and issue with lack of economic analysis.	2?
1	Homecare workers need more training, higher salaries, better retention mechanisms, and more support. Proposal does not address these needs.	1

0	Stop skimming union dues. Suggested alternative: better oversight, fraud prevention, and provider education/partnership to fix issues with unions skimming dues.	1
0	Attack on anti-worker organizations/unions and seniors/low income/disabled. NPRM prohibits workers from choosing to have their own union dues deducted from their paycheck and threatens health care insurance (no more premium deductions).	1
0	Attack on unions and working class people.	1
0	NPRM will make it more difficult for workers to organize and maintain unions which leads to reduction in wages and working conditions.	1
0	NPRM will jeopardize the critical care network that many of our members depend on to live in our homes and communities and oversteps a workers right to health insurance and their choice to be a union member, and hinders the unions ability to fight for home care programs like IHSS.	1
1	Providers in network are home care and should have right to be in a union.	1
0	Suggested funds go to union first and then the home care workers gets the leftover balance.	1
0		1

	Attack rights.	
	Standard practice for proposed federal rule changes is to allow for a 60-day open comment period before the proposal can be implemented.	
	Unions enable works to get health insurance, worker's comp, standard rule, paid sick.	
	Unionization has reduced turnover and improved the care relation and the reliability of care services. That is why states have chosen to engage in collective bargaining with these workers.	
0	No data to support assertion that Medicaid funds are being improperly used/diverted	1
0	NPRM will enhance obstacles to joining unions.	1
0	NPRM disenfranchises unions.	1
0	References Medicare Advantage	1
0	Extrapolated opposition/support from comment.	1
0	References Medicare Advantage	1
0	References insurance companies.	1
0	References Medicaid Advantage and insurance companies.	1
0	Extrapolated opposition/support from comment.	1

0 Extrapolated opposition/support
from comment. 1

0 2014 Reg was adopted by a
government agency (CMS)
contradicted a law passed by
congress. 1

0 Extrapolated opposition/support
from comment. 1

0 NPRM does not improve
effectiveness or efficiency of home
health care under CMS.
No data to support assertion that
Medicaid funds are being
improperly used/diverted. 1

0 Attack on unions. 1
Attack on rights to join union.
Violates fundamental justice.

0 threatens the well-being of these
particular workers, erodes the
quality of care. 1

0 Attack on workers. 1

Makes it harder to join a union.
Workers join on voluntary basis.
No data to support assertion that
Medicaid funds are being
improperly used/diverted.
Unions enable works to get health
insurance, worker's comp, standard
rule, paid sick.
Unionization has reduced turnover
and improved the care relation and
the reliability of care services. That
is why states have chosen to engage
in collective bargaining with these
workers.

0 Rule does not service public
interest. 1

	Extrapolated opposition/support from comment.	
0	Frustrating experience with union. 2014 Reg was adopted by a government agency (CMS) contradicted a law passed by congress.	1
0	Worker indicated when she began working as a caregiver for the state that she had to sign up for the union or wouldn't get paid.	1
0	Frustrating experience with union.	1
0	Frustrating experience with union. Interferes with healthcare delivery to home health care providers and their families in CA and creates burden without automatic deductions.	1
0	Deductions are not "assignments".	1
	Estimated \$150 million in Medicaid funds paid to unions for home care workers in 2017. \$1.4 billion in the last 17 years. Source: https://www.freedomfoundation.com/wp-content/uploads/2018/07/Getting-Organized-at-Home.pdf Alternative suggestion: issue a letter to states engaged in the practice of dues skimming and tell them they must stop + federal rules can be adopted making this practice illegal when using federal funds.	
0		1
	NPRM will reduce access to dental care for home health care providers and their families, increase admin costs that drive up premiums, and exceeds intention of Congress.	
0	Deductions are not "assignments"	1
0	References insurance companies.	1

0	<p>Home care workers prevent people from going into more costly institutions.</p> <p>Alternative suggestion: issue a letter to states engaged in the practice of dues skimming and tell them they must stop + federal rules can be adopted making this practice illegal when using federal funds.</p>	1
0	<p>Makes it harder to join a union.</p> <p>Cited 79 FR 2947, 3001.</p> <p>Unions enable works to get health insurance, worker's comp, standard rule, paid sick.</p> <p>Unionization has reduced turnover and improved the care relation and the reliability of care services. That is why states have chosen to engage in collective bargaining with these workers.</p> <p>Standard practice for proposed federal rule changes is to allow for a 60-day open comment period before the proposal can be implemented.</p> <p>No data to support assertion that Medicaid funds are being improperly used/diverted.</p> <p>Indicated CMS needs to look at quality of care issues.</p>	1
0	<p>Frustrating experience with union.</p> <p>Suggested it's possible for providers to arrange for payment of dues independent of federal payments if they wish and money collected by unions are used for out-of-state political activity.</p>	1

	CMS did not have authority for 2014 regulation.	
	NPRM will comply with Supreme Court ruling.	
	Referenced Freedom Foundation with estimated \$150 million in Medicaid funds in 2017 was paid to unions and \$1.4 billion total between 2000 and 2017. MN home care worker indicated \$1,000 was withheld and paid to a union she did not consent to join.	3
0	References Medicare Advantage	1
0	Frustrating experience with union.	1
	Named 11 states that do reassign payment to unions (California, Connecticut, Illinois, Maryland, Massachusetts, Minnesota, Missouri, New Jersey, Oregon, Vermont, and Washington). Freedom Foundation of Washington state reprot estimates current dues skimming diverts \$150 million annually from Medicaid Home and Community Based Services waiver funds to unions and a total of \$1.4 billion since 2000.	1

	Asked to clarify either in the final rule or through new regulation, that state governments cannot skim union dues or fees from Medicaid. Indicated 15 states in the last 20 years have paid more than \$1.4 billion to unions from Medicaid funds (cited Freedom Foundation). MN has taken more than \$8.5 million from home-health care providers for labor unions. MI and OH has taken more than \$36 million each. IL has taken just shy of \$100 million. Referenced Supreme Court	
0	decisions Harris v. Quinn	1
0	Frustrating experience with union. Unions enable works to get health insurance, worker's comp, standard rule, paid sick. Unionization has reduced turnover and improved the care relation and the reliability of care services. That is why states have chosen to engage in collective bargaining with these workers. Home care workers need training and unionization to maintain	1
0	benefits.	1
0	Washington State recently passed Senate Bill 6199 to privatize all home caregivers and place us under the National Labor Relations Act so employees are forced to pay mandatory union dues. Frustrating experience with union. Quoted \$600-1200/year goes to unions. Union spends money on political activity. Developmental Disabilities Administration provided/administers Medicaid in WA and commenter accused them	
0	of working closely with unions.	1

	Extrapolated opposition/support from comment.	
	Aging and Adult Services (state) is contracting with private company to provide services and now forces union dues beginning in 2019.	1
0	Referenced U.S. Supreme Court Janus decision protecting the rights of individuals not to subsidize union political activities.	
0	Indicated no dues skimming in WI. CMS's August 2016 memo on Suggested Approaches for Strengthening and Stabilizing the Medicaid Home Care Workforce outlined options for states to stabilize (training, development, professional and peer support, career ladder opportunities, health insurance etc.) the workforce delivering home and community-based care (HCBS). Many of the workforce stabilization strategies encouraged in this memo rely on the current direct care worker exemption outlined in 42 CFR 447.10(g)(4). NPRM will reduce state flexibility and lead to higher turnover and beneficiaries in institutions which are more expensive.	1

	<p>Attorney described many cases and examples of activities by SEIU against PCAs. Attachments include affidavits from PCAs and PCA agency personnel documenting the practices used by SEIU, a memo of my own summarizing the fraudulent practices used by SEIU, a copy of MNPCAs recent brief to the Minnesota Court of Appeals summarizing relevant facts, and an affidavit of State Representative Matthew Dean documenting the legislative chicanery of those supporting the dues skim in Minnesotas legislature this year. Indicated 11 states (including MN conduct dues skimming). Agreement between MN and SEIU indicates the state agreed to provide \$250,000 per year to the Training and Orientation Committee for providing trainings and orientation to Individual Providers. Indicated that Supreme Court has ruled that unions need clear consent before collecting dues from the paychecks of public employees, but this regulation left the door open for unions to continue skimming dues from the paychecks of Medicaid caregivers.</p>	1
0		1
0	<p>NPRM intent to strip low-wage home care workers of their insurance and benefits, to politically and financially attack the unions</p>	1

	Indicated Washington Senate Bill 6199 created loophole for unions to continue collection money to get around Supreme Court Decisions Harris v. Quinn.	
	Estimated that the amount of union dues that has been collected in Washington State alone from Medicaid paid caregivers totals more than \$190 million, and more than \$1.4 billion nationwide + does not include additional funds collected for contributions to political action committees.	3
0	Estimated \$190 million in Medicaid funds has been paid to unions in Washington.	
	Dues rate for the Washington Federation of State Employees is 1.5 percent. SEIU 775 collects 3.2 percent.	
	Indicates that current 2014 regulation violates statute.	
0	Recommends providers can join union voluntarily after receiving full compensation for services.	1
0		1
0		1
0		1
	makes it harder to unionize.	
	Will result in no financial savings, Discriminatory in intent because it applies only to the ability of care workers to checkoff union dues	
0		1
0	Extrapolated opposition/support from comment.	1
0		1

0	Union has done good for beneficiary's wife who cares for him.	1
0		1
0	Frustrating experience with union.	1
0	Frustrating experience with union.	1
0	Union member but support reg.	1
0		1
0		1
0	Attack on rights of home care workers to be in a union.	1
0		1
0		1
0	Extrapolated opposition/support from comment.	1
0		1
0	References Supreme Court Harris v. Quinn and Janus v. AFSCME. Indicates Washington State Senate Bill 6199 turned home health care workers into private contractors to avoid requirements of Harris decision and collect funds for union by requiring union membership to be employed and including the union dues in the contract.	3
0	Massachusetts: Personal Care Attendants (PCAs) are required to attend a paid 3-hour orientation to the PCA Program or get deducted from payroll at rate of \$2.00 per hour until the requirement is met. Questions impact of NPRM on orientation sanctions.	1

	Duplicate of 1570.	
	Extend 30 daycomment period.	
	Under section 2(b) of Executive Order 13563, Improving Regulation and Regulatory Review, the Department must afford the public a meaningful opportunity to commentwith a comment period that should generally be at least 60 days.	
	2014 Reg was 60 days.	
	Reg impacts at least 11 states.	
0	Issue with lack of economic analysis.	1
0		1
	Extrapolated opposition/support from comment.	
0		1
	Duplicate of 0002.	
	NPRM aligns with statute and 2014 reg did not.	
0		1
	Will be harder to find qualty home care workers.	
	Reduces protections for IHSS program.	
	Prior to unions and Public Authorities (PA), the home care workers were unreliable and	
1	abusive.	1
0		1
0		1

[illegible]

0	Stop skimming union dues.	1
0	Frustrating experience with union.	1
0	Support unions.	1
0		1
	Unions enable works to get health insurance, worker's comp, standard rule, paid sick.	1
1	Chris T. addressing seperately.	1
0	Support unions.	1
0		1
0	Support unions.	1
0	References insurance companies	1
	Recommended the final rule or an additional regulation must make clear that Section 32 prohibits the diversion of Medicaid payments to unions and their affiliates, and that only assignments to government agencies or by court orders are permitted.	
	Indicated dues are set at 3% of gross wages up to \$948 a year collected by SEUI.	
	MNPCA formed to decertify SEIU in MN after unusal union election to	
0	certify them.	1
0	Support workers.	1
0	Support workers.	1
0		1
0		1
0		1
0	Stop skimming union dues.	1
0		1
0		1
0		1
0		1
0		1
0		1
0	Support unions.	1

	NPRM undermines state's ability to directly deduct payments for unions or health care coverage.	
	Attack on rights.	
	Issue with lack of economic analysis and impact on state, beneficiaries, and home care workers.	
	Extend 30 day comment period.	
0	Request to withdraw NPRM.	1
0	Support unions.	1
	Indicated 13 states, including Massachusetts, have reassigned millions in Medicaid funds to public unions.	
	11 states are involved with SEIU.	
	Legislation exists in MA since 2006 (H.4758) to classify home workers as public employees or state workers so they are subject to union rules and dues, but do not get other benefits (like a pension).	
	SEIU collects \$5.1 million/year from PCAs in MA.	1
0		1
0		1

Payroll deductions and payment to vendors for benefits do not violate law. CA was doing it before the 2014 regulation.

Discussed health care plan that deducts premiums for IHSS providers and the NPRM will cause problems (lay off of staff) for health care plan.

Without health care to IHSS providers, there will be an increase in uncompensated care costs or Medicaid enrollment/cost when the providers go to the ER for care as well as a loss of revenue for the hospital because providers no longer have coverage.

Additional deductions include transportation passes for IHSS providers.

Rule will harm home care workers that prevent people from going into institutions that save government money.

County provides training for IHSS providers to improve quality of care and maintain stable workforce and if the NPRM impacts training program

1	then it will lead to turnover and	1
0	Stop skimming union dues.	1
0	Stop skimming union dues.	1
0	Stop skimming union dues.	1
0	Stop skimming union dues.	1
0	Stop skimming union dues.	1
0	Stop skimming union dues.	1
0	Stop skimming union dues.	1
0	Stop skimming union dues.	1
0	Stop skimming union dues.	1
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[illegible]

0	Alternative: Make rule voluntary.	1
0	Stop skimming union dues.	1
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0	Stop skimming union dues.	1

	NEITHER	SUPPORT	OPPOSE
	-	SUPPORT	-
Agree with payments made without deviations only benneficial for the insurance companies.	-	SUPPORT	-
I agree with the proposed rule.			
I am a Rheumatologist, with private partice in Puerto Rico.	-	SUPPORT	-
There should be restrictions to ensure that children's founds are used for kids only.	NEITHER	-	-
We need justice for the people of Puerto Rico.	NEITHER	-	-
I consider that is not fair that money...	NEITHER	-	-
Translated from Spanish: Thank you, I hope this is justice for us physicians	NEITHER	-	-
Translated from Spanish: We are a provider of radiology services in the region of Caguas, which offers services to Advantage patients	NEITHER	-	-
I agree with this proposed rule.			
Medicaid providers must be paid directly	-	SUPPORT	-
I hope that the regulations controls the irregular use of founds.	-	SUPPORT	-
Great! Resources should go to patients and care providers. Not to other purposes.	-	SUPPORT	-
Agree with the Rule proposed	-	SUPPORT	-
Definitely agree proposed regulation.		SUPPORT	
Costs of medical practice keep rising	-		-
The providers should receive payment	-	SUPPORT	-
Translated from Spanish: It is time to be compensated for our work.	-	SUPPORT	-

Physicians in Puerto Rico work under very difficult conditions.

NEITHER

-

-

that very important in PR the insurance company use the money and cut all fees to health providers
Excellent position

SUPPORT

-

-

-

SUPPORT

-

END Dues Skimming!

-

SUPPORT

-

DHHS, I am writing in opposition....

-

-

OPPOSE

DHHS, I am writing in opposition....
The Congress of California Seniors, a non-profit advocacy organization
This proposed change will have a severe impact for more than 24,000 elderly and individuals with disabilities currently receiving In-Home Supportive Services
DHHS, I am writing in support....

-

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OPPOSE

-

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OPPOSE

-

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OPPOSE

-

SUPPORT

-

DHHS, I am writing in opposition....
Home care workers do a difficult, often dangerous, and very necessary job for low pay...leave the earlier policy in place.

-

-

OPPOSE

-

-

OPPOSE

The Ethan Allen Institute welcomes the proposed rule.

-

SUPPORT

-

Hi I am a resident of kern county

NEITHER

-

-

DHHS, I am writing in opposition....

-

-

OPPOSE

END the skimming of union dues

-

SUPPORT

-

Instead of outright removing the exception, why not just reword it

NEITHER

-

-

CMS should assure that the designated funds for the providers be for the providers

-

SUPPORT

-

CMS should assure that the designated funds for the providers be for the providers

-

SUPPORT

-

This is just ridiculous and should be changed immediately.

-

SUPPORT

-

Home healthcare workers should be able to have their union dues deducted from their paycheck

-

-

OPPOSE

-

DHHS, I am writing in opposition....

-

OPPOSE

-

I am an IHSS provider for my disabled spouse.

-

OPPOSE

It is vital to home health care workers that paying union dues

-

-

OPPOSE

We don't need to take any money away from medicaid

-

SUPPORT

-

The proposed rule preventing union dues from being deducted from home care workers paychecks

-

OPPOSE

-

OPPOSE

-

The government must eliminate states ability to divert part of Medicaid payments from providers to third parties
I strongly support the proposed regulatory change.

SUPPORT

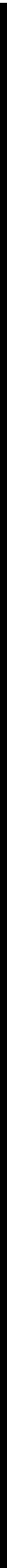
-

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SUPPORT

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NEITHER

-

SUPPORT

As a practicing physician and surgeon
in Puerto Rico I thank CMS for
recognizing the gravity of the issue at
hand

-

-

SUPPORT

-

-

My Name is Julie Dupr, my position was as an administrator for the campaign to decertify the SEIU Good measure. The funds for patient services should be used for that purpose alone.

Couldnt agree more with this proposed rule.

SUPPORT

-

-

SUPPORT

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-

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-

OPPOSE

SUPPORT

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NEITHER

-

This move by CMS would do justice to the PR medical class

As per the Federalist Papers is a requirement of justice that the products of labor go to those whose toils and troubles generated it.

This regulation, CMS-2413-P, is intended to strip union protections from already low waged healthcare employees.

The changes proposed to CMS-2413-P will be harmful to workers and consumers, some of the most vulnerable populations among us.

I am deeply troubled by this proposed change (cms-2413-p), HHS, CMS-2413-P directly threatens the livelihood of many hard-working Americans who provide necessary care across the country.

I am a provider of Medicare / Medicaid for the last 25 years

I am writing to urge you to keep the 2014 addendum or clarification in the Medicaid provision concerning third-parties.

Stripping home care workers of their right to voluntarily avail themselves of union representation would be thoroughly gratuitous and enormously destructive.

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NEITHER

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SUPPORT

SUPPORT

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OPPOSE

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OPPOSE

OPPOSE

The recent Supreme Court ruling stripping unions of the ability to collect agency fee was rationalized on the grounds of choice - free speech. The proposed regulatory change (CMS 2413-P) is not needed. I write because I would urge you to block the proposed rule change

-

OPPOSE

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OPPOSE

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-

OPPOSE

I am submitting these comments in my capacity as Director of Government Accountability at the Show-Me Institute

SUPPORT

-

-

As a union representing over 70,000 independent providers of homecare and interpretation services for which the Medicaid program is the primary source of service revenue

NEITHER

-

For many years---more than a decade--I worked with and assisted homecare workers

-

-

OPPOSE

To skim dues from an already struggling and underfunded program is disgusting to say the least.

SUPPORT

-

-

This is a blatant attack/attempt by anti-worker organizations and this Administration (Trump) to destroy our unions and weaken our collective voices.

-

-

OPPOSE

I am deeply concerned that this rule change will endanger elders and other vulnerable populations who are served by state workers

-

-

OPPOSE

As our population ages, well-qualified home care workers will be increasingly hard to find
I help take care of my child. I dont want to be apart of a union.

-

-

OPPOSE

-

SUPPORT

-

-

I am writing on behalf of Hand in Hand: The Domestic Employers Network in opposition to proposal

-

OPPOSE

this comment is in support of CMS proposal number CMS-2413-P
I opted out of the union

-

SUPPORT

-

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SUPPORT

-

I am writing in opposition
There should be no alterations that in effect, make it very difficult for workers to choose to join unions. My Union, SEIU 1199, fights for my rights for a measly amount each month.

-

OPPOSE

Health insurance Advantage program are not paying what they should be. I am writing to oppose rule change CMS-2413-P.
Thanks CMS !! We as doctors are financing the medical business in Puerto Rico.

NEITHER

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OPPOSE

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OPPOSE

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OPPOSE

SUPPORT

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This rule will be extremely useful in Puerto Rico because many intermediaries (insurance companies) benefit from these monies depriving providers of adequate reimbursement for their services and ultimately limited services for the patients.

SUPPORT

-

-

We gladly welcome this proposed rule of reassignment of provider claims. At last CMS propose a measure that does justice to the medical class

SUPPORT

-

-

SUPPORT

-

-

This is a much needed regulation in order to keep doctors in island and make justice to them

SUPPORT

-

-

We are caregivers for our son who is on Medicaid. The union SEIU775NW has told us that we were required to pay union dues
and that it would be taken out of our paychecks. Certainly, this measure is an advance to justice for the medical class and other health providers, since, if approved, insurers will be prevented from using Medicare funds destined to health providers at their best convenience.

SUPPORT

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SUPPORT

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I strongly oppose this proposed rule change.

-

OPPOSE

-

I wish to oppose the rule CMS-2413-P
I am writing to oppose CMS-2413-P

-

OPPOSE

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OPPOSE

-

I write in opposition to the proposed rule change CMS-2413-P

-

OPPOSE

Please keep fighting for people who care for their sick or disabled family members in their own homes ... SEUI is evil

SUPPORT

-

-

Federal Medicaid law requires that states make payments for services directly

SUPPORT

-

-

I have been trying to opt out of the S.E.I.U. 503 union for three yeas or more.

SUPPORT

-

-

I am a Homecare Worker that servest Medicaid clients in Oregon.

SUPPORT

-

-

-

-

OPPOSE

SUPPORT

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-

I entirely agree

-

-

SUPPORT

OPPOSE

-

I am concerned that the proposed rule change will undermine the ability of health care workers to join and participate in effective unions.

SUPPORT

-

-

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OPPOSE

-

I opposed the suggested rule change I am a home care aide paid through Medicaid funding. I have been and continue to be highly opposed to SEIU forcing me to pay union dues.

-

OPPOSE

SUPPORT

-

-

States, including Nebraska, enter into a serious fiscal arrangement with the federal government through their participation in the Medicaid program.

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NEITHER

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SUPPORT

In order to decrease the exodus of physicians from Puerto Rico, we need regulations like this one.

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SUPPORT

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-

I am a caregiver for a Medicaid client.

-

SUPPORT

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SUPPORT

The Rio Grande Foundation is a 501c3 not-for-profit organization based in Albuquerque, New Mexico.

-

-

SUPPORT

I support proposal CMS-2413-P.

-
-

SUPPORT

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-

-

I OPPOSE the repeal/removal of the
clause
Excellent measure.

-
-

SUPPORT

OPPOSE
-

SUPPORT

I am writing in support proposal
number CMS-2413-P.

-

-

SUPPORT

I'm an IP in Olympia who opted out of SEIU.

-

-

SUPPORT

We write in support of the proposed rule

-

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OPPOSE

SUPPORT

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The rule would stop unions from
skimming dues from Medicaid
caregiver benefits and would enforce
affirmative consent to Medicaid
caregiver union membership.

SUPPORT

-

-

This rule is an outrageous overreach
by the administration

-

-

OPPOSE

SUPPORT

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SUPPORT

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-

Im a interventional nephrologist , in
my practice reimbursement for
different procedures are all over the
place
Complaint about Humana
do not pass this

NEITHER

NEITHER

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OPPOSE

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OPPOSE

As a committed to my patients'
provider, I will expect to be paid
according to services provided and
without hold back payments from
insurancde management.
Medicaid funds should be prioritized
for care of the truly needy

SUPPORT

-

-

SUPPORT

-

-

This program is important to me because it allows me to be live in my home and be cared for by my wife, Sonia.

-

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OPPOSE

I am a current caregiver of a Medicaid client and I support this proposal.

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SUPPORT

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I am a caregiver for my son which is a Medicaid client

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SUPPORT

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SUPPORT

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OPPOSE

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SUPPORT

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OPPOSE

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OPPOSE

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OPPOSE

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[illegible]

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-	-	OPPOSE
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NEITHER	-	-

SUPPORT

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[REDACTED]

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OPPOSE

OPPOSE

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NEITHER

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OPPOSE

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When are you going to start protecting our elderly voters?

Support caregivers. Do not pass this regulation.

-	SUPPORT	-
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NEITHER	-	-
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Labor unions should not be allowed
to collect dues from employees who
do not want to to belong

NEITHER

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SUPPORT

SUPPORT

SUPPORT

SUPPORT

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# NEITHER	25
# SUPPORT	174
# OPPOSE	95
TOTAL	294

Final # of Posted Comment (Last 4 digits of the Document ID)	Attachment?	Author First Name	Author Last Name	Location (State/Province)
7167	Yes	N/A	N/A	Multiple
CMS-2018-0090-6798	Yes	Multiple	Multiple	Multiple
CMS-2018-0090-6799	Yes			
CMS-2018-0090-6800	Yes			
CMS-2018-0090-6811	Yes			
CMS-2018-0090-6813	Yes			
CMS-2018-0090-6810	Yes			
CMS-2018-0090-6812	Yes			
CMS-2018-0090-6814	Yes			
CMS-2018-0090-6815	Yes			
CMS-2018-0090-6816	Yes			
CMS-2018-0090-6817	Yes			
CMS-2018-0090-6818	Yes			
CMS-2018-0090-6819	Yes			
CMS-2018-0090-6820	Yes			
CMS-2018-0090-6821	Yes			
CMS-2018-0090-6822	Yes			
CMS-2018-0090-6823	Yes			
CMS-2018-0090-6824	Yes			
CMS-2018-0090-6825	Yes			
CMS-2018-0090-6826	Yes			
CMS-2018-0090-6827	Yes			
CMS-2018-0090-6828	Yes			
CMS-2018-0090-6829	Yes			
CMS-2018-0090-6830	Yes			
CMS-2018-0090-6831	Yes			
CMS-2018-0090-6832	Yes			
CMS-2018-0090-6833	Yes			
CMS-2018-0090-6834	Yes			
CMS-2018-0090-6835	Yes			
CMS-2018-0090-6836	Yes			
CMS-2018-0090-6837	Yes			
CMS-2018-0090-6838	Yes			
CMS-2018-0090-6839	Yes			

CMS-2018-0090-6840	Yes
CMS-2018-0090-6841	Yes
CMS-2018-0090-6842	Yes
CMS-2018-0090-6843	Yes
CMS-2018-0090-6844	Yes
CMS-2018-0090-6845	Yes
CMS-2018-0090-6846	Yes
CMS-2018-0090-6847	Yes
CMS-2018-0090-6848	Yes
CMS-2018-0090-6849	Yes
CMS-2018-0090-6850	Yes
CMS-2018-0090-6851	Yes
CMS-2018-0090-6852	Yes
CMS-2018-0090-6853	Yes
CMS-2018-0090-6854	Yes
CMS-2018-0090-6855	Yes
CMS-2018-0090-6856	Yes
CMS-2018-0090-6857	Yes
CMS-2018-0090-6858	Yes
CMS-2018-0090-6859	Yes
CMS-2018-0090-6860	Yes
CMS-2018-0090-6861	Yes
CMS-2018-0090-6862	Yes
CMS-2018-0090-6863	Yes
CMS-2018-0090-6864	Yes

Organization	Form Letter?	Total Comments/ Signatures	Comment Matches Pivot Comment on Duplicates Tab? (include Pivot Comment Document ID)	In Support (1 = Yes) (0 =No)	In Opposition (1 = Yes) (0 =No)
Online Petition	No	7172	Y	1	0
Write in Campaign	Yes	106	Y	0	1

AMERICAN
OVERSIGHT

[illegible]

OPPOSE

-

NEITHER

57

TOTAL	
NEITHER	0
TOTAL	
SUPPORT	
TOTAL	
OPPOSE	106
TOTAL	
"PAGES"	
WITHIN	
COMMENT	106

OPPOSE

SUPPORT

1

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OPPOSE

1

TOTAL

"COMMENTS"

59

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Final # of Posted Comment (Last 4 digits of the Document ID)	Attachment?	Author First Name	Author Last Name	Location (State/ Province)
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1441	No	Alexandria	Marquez	AL
6701	No	David	Doherty	MO
2086	No	Loren	Freeman	WA

Organization	Form Letter?	Total Comments/ Signatures	Duplicate?	In Support (1 = Yes) (0 =No)	In Opposition (1 = Yes) (0 =No)
N/A	N	1	Y	0	1
N/A	N	1	Y	1	0
N/A	N	1	N		

Impact on Self-Direct Service Models	Special Considerations (if applicable)	Special Codes: Outside Organization/Individual - 1 Provider Advocacy Group 2 Political- 3
0	Exact duplicate of 1425 from same individual	1
0	Exact duplicate of 6721 from same individual	1
	Duplicate of 1901.	1

Final # of Posted Comment (Last 4 digits of the Document ID)	Attachment?	Author First Name	Author Last Name	Location (State/ Province)	Organization
5802	No	Dennis	Moore	GA	N/A
6590	No	Gerald	Smith	VA	N/A
0881	No	Wesley	Ether	CA	N/A
2145	No	Barbara	Richardson	TN	N/A
2177	No	Cherlyn	Akerly	CO	N/A

Form Letter?	Total Comments/Signatures	Duplicate?	In Support (1 = Yes) (0 =No)	In Opposition (1 = Yes) (0 =No)	Summary of Comment (if applicable)
N	1	N	0	0	"Please stop"
N	1	N	0	0	"Crooks"
N	1	N	0	0	"Comment"
N	1	N	0	0	"Please stop"
N	1	N	0	0	"This is not right or American"

Justification of Comment Being Out of Scope	Special Considerations (if applicable)	Special Codes: Outside Organization/Individual - 1 Provider Advocacy Group 2 Political- 3
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No interpretable comment.		1
No interpretable comment.		1
No interpretable comment.		1
No interpretable comment.		1
No interpretable comment.		1

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Cantwell, Kenya J. \(CMS/CMCS\)](#); [Harris, Melissa L. \(CMS/CMCS\)](#)
Subject: PRR: CMS-2413-F (10-23-18) (CMSD OGC markup v2).docx
Date: Tuesday, November 20, 2018 4:24:00 PM
Attachments: [CMS-2413-F \(10-23-18\) \(CMSD OGC markup v2\).docx](#)

Your message is ready to be sent with the following file or link attachments:

CMS-2413-F (10-23-18) (CMSD OGC markup v2).docx

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

Page 1684 redacted for the following reason:

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Page 1712 redacted for the following reason:

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Page 1713 redacted for the following reason:

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Page 1714 redacted for the following reason:

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Boston, Beverly A. \(CMS/CMCS\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#)
Cc: [Howe, Rory \(CMS/CMCS\)](#); [Lane, Robert \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#)
Subject: RE: DUE 2pm Today: Papers for 9/5 Issues Meeting
Date: Thursday, August 30, 2018 2:28:00 PM
Attachments: [PRR High level comments summary 8.30.18.docx](#)

Hey Kristin and Janet,

Attached is a draft summary of the PRR comments. We analyzed 72% of the comments at this point. We will definitely have more information to add to this summary within the next week.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Boston, Beverly A. (CMS/CMCS)
Sent: Thursday, August 30, 2018 11:53 AM
To: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Howe, Rory (CMS/CMCS) <Rory.Howe@cms.hhs.gov>; Lane, Robert (CMS/CMCS) <Robert.Lane@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>
Subject: RE: DUE 2pm Today: Papers for 9/5 Issues Meeting

I agree and the Issues meeting is for 45min only. Hope they can get through everything.

Beverly

From: Fan, Kristin A. (CMS/CMCS)

Sent: Thursday, August 30, 2018 11:41 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>

Cc: Howe, Rory (CMS/CMCS) <Rory.Howe@cms.hhs.gov>; Lane, Robert (CMS/CMCS) <Robert.Lane@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>

Subject: RE: DUE 2pm Today: Papers for 9/5 Issues Meeting

Thanks – and I know this is completely unreasonable.

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Thursday, August 30, 2018 8:54 AM

To: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>

Cc: Howe, Rory (CMS/CMCS) <Rory.Howe@cms.hhs.gov>; Lane, Robert (CMS/CMCS) <Robert.Lane@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>

Subject: RE: DUE 2pm Today: Papers for 9/5 Issues Meeting

Hey Kristin,

We will submit a paper for your review by 2pm.

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410) 786-4044

Mobile: (b)(6)

Fax: (410) 786-8533

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From: Fan, Kristin A. (CMS/CMCS)

Sent: Thursday, August 30, 2018 8:51 AM

To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>

Cc: Howe, Rory (CMS/CMCS) <Rory.Howe@cms.hhs.gov>; Lane, Robert (CMS/CMCS) <Robert.Lane@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>

Subject: Re: DUE 2pm Today: Papers for 9/5 Issues Meeting

The disallowance summaries are fine. And OCD should have the other two access papers that were sent previously. I don't know that we'll have paper for provider reassignment- it may have to be verbal but defer to Chris.

Sent from my iPhone

On Aug 30, 2018, at 8:37 AM, Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov> wrote:

Good morning,

Per the OCD, papers for Issues are due to the OCD by 4pm today to be cleared in time for OA's 10am Friday deadline. OCD has the most recent version of the Access timeline.

-**DFO**, Please confirm whether there are changes to the CA and CT papers.

-**Chris**, please provide the Provider Payment Reassignment summary of comments by 2pm so that Kristin and Janet may review it in advance of today's 4pm deadline.

Thanks

Beverly

From: Mack, Rosa (CMS/CMCS)

Sent: Wednesday, August 29, 2018 5:59 PM

To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Setala, Ashley (CMS/CMCS) <Ashley.Setala@cms.hhs.gov>; Sheppard, Brenda D. (CMS/CMCS) <Brenda.Sheppard@cms.hhs.gov>; Ghafari, Pascale (CMS/CMCS) <Pascale.Ghafari@cms.hhs.gov>; Delozier, Adrienne M. (CMS/CMCS) <Adrienne.Delozier@cms.hhs.gov>; Conover, Lillian A. (CMS/CMCS) <Lillian.Conover@cms.hhs.gov>; Erwin, Tanesha (CMS/CMCS) <Tanesha.Erwin@cms.hhs.gov>; Guarisco, Victoria M. (CMS/CMCS) <Victoria.Guarisco@cms.hhs.gov>; Fuller, Barbara A. (CMS/CMCS) <Barbara.Fuller@cms.hhs.gov>; Corbin, Angela T. (CMS/CMCS) <Angela.Corbin@cms.hhs.gov>; Whelan, Ellen Marie (CMS/CMCS) <EllenMarie.Whehan@cms.hhs.gov>; Llanos, Karen E. (CMS/CMCS)

<Karen.Llanos@cms.hhs.gov>

Cc: Dunn, Victoria (CMS/CMCS) <Victoria.Dunn@cms.hhs.gov>; Nelson, Barbara A. (CMS/CMCS) <Barbara.Nelson@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>

Subject: RE: Lela is on Vacation

Hi. According to Lela's instructions, the draft agenda is supposed to be sent on Mondays (1. Send the draft agenda to the SA's - Sneak peek on Monday's). Since today is Wednesday, I assumed that this was on Monday when she was still here. But you know what happens when you assume...

My guess is that Kristin received the agenda through the SS materials, since it is a standing item on the agenda and included in the materials. I'm pretty sure you all have access to the materials, but attaching the draft Issues agenda here just in case. The package for Issues is due by 10 am on Friday, which means I will need any paper by 4pm tomorrow. I was going to circle back with you all after SS to share any updates and check in on paper.

Let me know if you have any edits to the agenda or additional questions/concerns. happy to chat 😊. Thanks for the help!

From: Boston, Beverly A. (CMS/CMCS)

Sent: Wednesday, August 29, 2018 5:11 PM

To: Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Setala, Ashley (CMS/CMCS) <Ashley.Setala@cms.hhs.gov>; Sheppard, Brenda D. (CMS/CMCS) <Brenda.Sheppard@cms.hhs.gov>; Ghafari, Pascale (CMS/CMCS) <Pascale.Ghafari@cms.hhs.gov>; Delozier, Adrienne M. (CMS/CMCS) <Adrienne.Delozier@cms.hhs.gov>; Conover, Lillian A. (CMS/CMCS) <Lillian.Conover@cms.hhs.gov>; Erwin, Tanesha (CMS/CMCS) <Tanesha.Erwin@cms.hhs.gov>; Guarisco, Victoria M. (CMS/CMCS) <Victoria.Guarisco@cms.hhs.gov>; Fuller, Barbara A. (CMS/CMCS) <Barbara.Fuller@cms.hhs.gov>; Corbin, Angela T. (CMS/CMCS) <Angela.Corbin@cms.hhs.gov>; Whelan, Ellen Marie (CMS/CMCS) <EllenMarie.Whelehan@cms.hhs.gov>; Llanos, Karen E. (CMS/CMCS) <Karen.Llanos@cms.hhs.gov>

Cc: Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Dunn, Victoria (CMS/CMCS) <Victoria.Dunn@cms.hhs.gov>; Nelson, Barbara A. (CMS/CMCS) <Barbara.Nelson@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>

Subject: RE: Lela is on Vacation

Hello,

Who is sending out draft Issues meeting agendas? Please remember to include

SAs. Lela usually sends them to SA and we respond with changes. I received the draft agenda for the next two Issues meetings from Kristin so I am guessing the draft went to managers, please also include SAs as the SA (speaking for FMG) provide all discussion papers.

Beverly

From: Teal, Lela (CMS/CMCS)

Sent: Tuesday, August 28, 2018 2:28 PM

To: Setala, Ashley (CMS/CMCS) <Ashley.Setala@cms.hhs.gov>; Sheppard, Brenda D. (CMS/CMCS) <Brenda.Sheppard@cms.hhs.gov>; Ghafari, Pascale (CMS/CMCS) <Pascale.Ghafari@cms.hhs.gov>; Delozier, Adrienne M. (CMS/CMCS) <Adrienne.Delozier@cms.hhs.gov>; Conover, Lillian A. (CMS/CMCS) <Lillian.Conover@cms.hhs.gov>; Erwin, Tanesha (CMS/CMCS) <Tanesha.Erwin@cms.hhs.gov>; Guarisco, Victoria M. (CMS/CMCS) <Victoria.Guarisco@cms.hhs.gov>; Fuller, Barbara A. (CMS/CMCS) <Barbara.Fuller@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Corbin, Angela T. (CMS/CMCS) <Angela.Corbin@cms.hhs.gov>; Whelan, Ellen Marie (CMS/CMCS) <EllenMarie.Whelelan@cms.hhs.gov>; Llanos, Karen E. (CMS/CMCS) <Karen.Llanos@cms.hhs.gov>
Cc: Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Dunn, Victoria (CMS/CMCS) <Victoria.Dunn@cms.hhs.gov>; Nelson, Barbara A. (CMS/CMCS) <Barbara.Nelson@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>

Subject: Lela is on Vacation

Hi,

Lela is on vacation – until September 11th

Schedules – Barbara, Vic

Clearance materials placed on calendar: Barbara, Vic

Signature items – Barbara for Tim/Deidre; Vic for Calder

CMCS Tracker – Rosa

Anything needing Tim/Deidre's attention – Rosa

Anything needing Calder's attention – Sara (starting September 4 – Rosa until then)

Enjoy,

Lela Teal

Center for Medicaid and CHIP Services | O: 410.786.1064 | iPhone:

(b)(6)

lela.teal@cms.hhs.gov

<CMCS Draft Agendas for Weeks 9-05-18 and 9-11-18.docx>

<CA DP-NF Disallowance Summary 8-27-18.docx>

<CT DSH Disallowance Summary 8-27-18 DFO (002).docx>

<FMG_MFAR_Briefing_Timeline.xlsx>

Provider Reassignment Regulation (CMS-2413-P)

Summary of Public Comments

Total Commenters = 7,182

Unique Commenters = 2,261

Comments Analyzed = 5,172

Percentage Complete: 72%

States = 0

Individuals = 5,159 (Including providers)

Organizations = 13 (Including Provider Advocacy Groups)

Major Themes:

In Support of the proposed rule:

- *Many commenters highlighted the union dues skimming aspect of the proposed rule.*
- *Several commenters referenced recently signed legislation in both Minnesota and Washington that would automatically make home care providers union members.*

In opposition of the proposed rule:

- *One commenter suggested making all provider reassignments voluntary.*
- *Several commenters indicated that implementation of this proposed rule would negatively impact access to and quality of home care services.*
- *Several commenters highlighted the fact the CMS did not have enough data to determine the economic significance associated with rescinding 42 CFR 447.10(g)(4), yet the Agency chose a 30 day comment period. Based on our preliminary analysis, we have not uncovered any comments that provide specific detail regarding the economic significance of this rule.*

National Organizations:

- The National Association of States United for Aging and Disabilities (NASUAD) suggested adding additional language to the rule to specifically allow for the option to deduct finance cost associated with self-directed care, including fiscal intermediary services, payroll taxes, and other necessary expenses. DEHPG/LTSS and DEHPG/DBC is currently reviewing this comment.

Congressional Comments:

- Based on our preliminary analysis, Senators Ron Johnson (WI) and Rep. Matt Dean of the Minnesota House of Representatives provided comments in support of the proposed rule.

Provider Reassignment Regulation (CMS-2413-P)

Summary of Public Comments

- All other comments from Congress were in opposition of the rule. The reasons for opposition include:
 - *The use a 30 day comment period*
 - *The lack of any meaningful or quantitative analysis of the costs associated with this rule.*
 - *The potential negative impact on access to and quality of home and community-based services.*

States that submitted comments:

Preliminary analysis has not yielded any comments directly submitted from states.

Write-in Campaigns – California, Washington, Florida

Individuals overwhelming opposed the proposed rule. These form letters cite CMS's overreach of authority designed to attack home care workers and their freedom to spend their wages as they choose.

Major Decision Points/ Next Steps:

N/A

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Boston, Beverly A. \(CMS/CMCS\)](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#)
Subject: RE: DUE MON 11/5: HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F
Date: Friday, November 2, 2018 3:44:00 PM
Attachments: [Final Rule briefing paper for HHS principals briefing - CMS 2413-F Re.....docx](#)

Hey Beverly,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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Fax: (410) 786-8533

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From: Boston, Beverly A. (CMS/CMCS)
Sent: Wednesday, October 31, 2018 11:30 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>
Subject: DUE MON 11/5: HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F

Hello,

Lela forwarded the string to me. See attached HHS Reviewers briefing paper used for the PRR

NPRM. Please update for the final rule briefing. Please cc: me when you respond back to OSORA so I have a record of the action and date for the reviewers briefing.

Thanks

Beverly

From: Teal, Lela (CMS/CMCS)
Sent: Wednesday, October 31, 2018 7:39 AM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: FW: HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F

Please see below

From: Barco, Evell J. (CMS/OSORA)
Sent: Tuesday, October 30, 2018 5:55 PM
To: Harshman, Sara (CMS/CMCS) <Sara.Harshman@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>
Cc: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F

Hello,

Since we have completed OA briefings and the rule has been submitted for CMS review, I am preparing for next steps. When the rule is submitted to HHS for review (date currently uncertain), the HHS reviewers paper should accompany it. Please provide a briefing paper by Monday, Nov 5 to ensure it moves timely.

Please contact me if you have questions. Thanks.

Page 1725 redacted for the following reason:

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Page 1726 redacted for the following reason:

(b)(5)

Page 1727 redacted for the following reason:

(b)(5)

From: [Boston, Beverly A. \(CMS/CMCS\)](#)
To: [Barco, Evell J. \(CMS/OSORA\)](#)
Cc: [Fan, Kristin A. \(CMS/CMCS\)](#); [Farrell, Caroline \(HHS/OGC\)](#); [Fultz-Mimms, Trenesha N. \(CMS/OSORA\)](#); [Popp, Dawn \(HHS/OGC\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#); [Teal, Lela \(CMS/CMCS\)](#); [Mack, Rosa \(CMS/CMCS\)](#); [Harshman, Sara \(CMS/CMCS\)](#)
Subject: RE: HHS Reviewers Briefing- Reassignment of Medicaid Provider Claims -- CMS-2413-F
Date: Friday, December 7, 2018 12:25:23 PM
Attachments: [Briefing paper for HHS Reviewers.docx](#)

Paper attached.

Thanks

Beverly

From: Boston, Beverly A. (CMS/CMCS)
Sent: Friday, December 7, 2018 12:18 PM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Harshman, Sara (CMS/CMCS) <Sara.Harshman@cms.hhs.gov>
Subject: RE: HHS Reviewers Briefing- Reassignment of Medicaid Provider Claims -- CMS-2413-F

Noon is fine. I'm checking on paper and will get back to you.

Thanks

Beverly

From: Barco, Evell J. (CMS/OSORA)
Sent: Friday, December 7, 2018 12:12 PM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Harshman, Sara (CMS/CMCS) <Sara.Harshman@cms.hhs.gov>
Subject: Re: HHS Reviewers Briefing- Reassignment of Medicaid Provider Claims -- CMS-2413-F

Hi

The dept cannot make 10:30 work.

They are available Tues as follows:

Noon

2pm

3:30pm

5pm

Do you think paper will be ready today?

Sent from my iPhone

On Dec 7, 2018, at 11:18 AM, Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov> wrote:

Hi Evell,

Confirming that the rule is in concurrent CMS (comments due 12/11) and HHS (comments due 12/13) clearances? Also, can the HHS briefing take place on Tues 10/12 at 10:30am? Monday is packed. We'll provide the briefing paper.

Thank you

Beverly

From: Barco, Evell J. (CMS/OSORA)

Sent: Thursday, December 6, 2018 10:48 AM

To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Harshman, Sara (CMS/CMCS) <Sara.Harshman@cms.hhs.gov>

Cc: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>

Subject: HHS Reviewers Briefing- Reassignment of Medicaid Provider Claims -- CMS-2413-F

Good morning,

This rule was submitted to HHS for clearance this morning with comments due Thurs, Dec 13. The Dept is requesting a briefing Monday afternoon on Dec 10.

1. Please confirm your availability for the briefing.
2. Please determine if any changes are necessary to the briefing material you submitted in early Nov.
3. Identify the presenter(s).

Thanks.

Page 1731 redacted for the following reason:

(b)(5)

Page 1732 redacted for the following reason:

(b)(5)

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Fan, Kristin A. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Cc: [Boston, Beverly A. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#)
Subject: RE: Provider payment reassignment
Date: Tuesday, September 11, 2018 10:20:00 AM
Attachments: [PBB_High_level_comments_summary_9.11.18 - Copy.docx](#)

Hey Kristin,

Attached is a revised comment analysis. Team members will submit an up-to-date comment analysis by COB today and we will be able to report a higher percentage of completion later today.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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-----Original Message-----

From: Fan, Kristin A. (CMS/CMCS)
Sent: Tuesday, September 11, 2018 9:42 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>
Subject: FW: Provider payment reassignment

Can you send to me?

-----Original Message-----

From: Lynch, Calder (CMS/OA)
Sent: Tuesday, September 11, 2018 9:41 AM
To: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>
Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>
Subject: Provider payment reassignment

Can you send me the current comment analysis doc? Have we finished- or what % are we? Brady has mtg at EOP this am where she will be asked.

Sent from my iPhone

Provider Reassignment Regulation (CMS-2413-P)
Summary of Public Comments
As of 9/11/18

Total Commenters = 7,182

Unique Commenters = 2,261

Comments Analyzed = 5,849

Percentage Complete: 81.43%

States = 0

Individuals = 5,849 (Including providers)

Organizations = 13 (Including Provider Advocacy Groups)

Major Themes:

In Support of the proposed rule:

- *Many commenters highlighted the union dues skimming aspect of the proposed rule.*
- *Several commenters referenced recently signed legislation in both Minnesota and Washington that would automatically make home care providers union members.*

In opposition of the proposed rule:

- *One commenter suggested making all provider reassignments voluntary.*
- *Several commenters indicated that implementation of this proposed rule would negatively impact access to and quality of home care services.*
- *Several commenters highlighted the fact the CMS did not have enough data to determine the economic significance associated with rescinding 42 CFR 447.10(g)(4), yet the Agency chose a 30 day comment period. Based on our preliminary analysis, we have not uncovered any comments that provide specific detail regarding the economic significance of this rule.*

National Organizations:

- The National Association of States United for Aging and Disabilities (NASUAD) suggested adding additional language to the rule to specifically allow for the option to deduct finance cost associated with self-directed care, including fiscal intermediary services, payroll taxes, and other necessary expenses. FMG is currently working with DEHPG/LTSS and DEHPG/DBC with regard to draft language to be inserted into the comments and responses portion of the NPRM for the final rule.

Congressional Comments:

Provider Reassignment Regulation (CMS-2413-P)
Summary of Public Comments
As of 9/11/18

- Based on our preliminary analysis, Senators Ron Johnson (WI) and Rep. Matt Dean of the Minnesota House of Representatives provided comments in support of the proposed rule.
- All other comments from Congress were in opposition of the rule. The reasons for opposition include:
 - *The use a 30 day comment period*
 - *The lack of any meaningful or quantitative analysis of the costs associated with this rule.*
 - *The potential negative impact on access to and quality of home and community-based services.*

States that submitted comments:

Preliminary analysis has not yielded any comments directly submitted from states.

Write-in Campaigns – California, Washington, Florida

Individuals overwhelming opposed the proposed rule. These form letters cite CMS's overreach of authority designed to attack home care workers and their freedom to spend their wages as they choose.

(b)(5)

(b)(5)

Major Decision Points/ Next Steps:

N/A

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Fan, Kristin A. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Cc: [Boston, Beverly A. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#)
Subject: RE: Provider payment reassignment
Date: Wednesday, September 12, 2018 10:41:00 AM
Attachments: [PRR_High_level_comments_summary_9.12.18.docx](#)

Hi Kristin,

Attached is an updated PRR Comments Analysis. Revisions Include

- 91% Complete
- We note that several commenters suggest that the proposed rule runs counter to state flexibility.
- We received comments from the states of CA/PA and NY.

The CA AG indicates that this rule is an intrusion on state labor laws and it raises Federalism concerns, as well as violates the Tenth Amendment, and intrudes upon state sovereignty. We will seek OGC's assistance with regard to this letter.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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-----Original Message-----

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, September 11, 2018 10:20 AM
To: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>
Subject: RE: Provider payment reassignment

Hey Kristin,

Attached is a revised comment analysis. Team members will submit an up-to-date comment analysis by COB today and we will be able to report a higher percentage of completion later today.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing Center for Medicaid and CHIP Services Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
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Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>
Subject: FW: Provider payment reassignment

Can you send to me?

-----Original Message-----

From: Lynch, Calder (CMS/OA)
Sent: Tuesday, September 11, 2018 9:41 AM
To: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>
Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>
Subject: Provider payment reassignment

Can you send me the current comment analysis doc? Have we finished- or what % are we? Brady has mtg at EOP this am where she will be asked.

Sent from my iPhone

Provider Reassignment Regulation (CMS-2413-P)
Summary of Public Comments
As of 9/12/18

Total Commenters = 7,182

Unique Commenters = 2,261

Comments Analyzed = 6,532

Percentage Complete: 91%

States = 6 (Including the counties of Alameda and Santa Clara, CA)

Individuals = 6,460 (Including providers)

Organizations = 41 (Including Provider Advocacy Groups)

Political Comments = 25 (Both State and Federal Representatives)

Major Themes:

In Support of the proposed rule:

- *Many commenters highlighted the union dues skimming aspect of the proposed rule.*
- *Several commenters referenced recently signed legislation in both Minnesota and Washington that would automatically make home care providers union members.*

In opposition of the proposed rule:

- *One commenter suggested making all provider reassignments voluntary.*
- *Several commenters indicated that implementation of this proposed rule would negatively impact access to and quality of home care services.*
- *Several commenters highlighted the fact the CMS did not have enough data to determine the economic significance associated with rescinding 42 CFR 447.10(g)(4), yet the Agency chose a 30 day comment period. Based on our preliminary analysis, we have not uncovered any comments that provide specific detail regarding the economic significance of this rule.*
- *Several commenters suggested implementation of this proposed rule runs counter to state flexibility.*

National Organizations:

- The National Association of States United for Aging and Disabilities (NASUAD) suggested adding additional language to the rule to specifically allow for the option to deduct finance cost associated with self-directed care, including fiscal intermediary services, payroll taxes, and other necessary expenses. FMG is currently working with DEHPG/LTSS and DEHPG/DBC

Provider Reassignment Regulation (CMS-2413-P)
Summary of Public Comments
As of 9/12/18

with regard to draft language to be inserted into the comments and responses portion of the NPRM for the final rule.

Congressional Comments:

- Based on our preliminary analysis, Senators Ron Johnson (WI) and Rep. Matt Dean of the Minnesota House of Representatives provided comments in support of the proposed rule.
- All other comments from Congress were in opposition of the rule. The reasons for opposition include:
 - *The use a 30 day comment period*
 - *The lack of any meaningful or quantitative analysis of the costs associated with this rule.*
 - *The potential negative impact on access to and quality of home and community-based services.*

State-submitted comments:

Preliminary analysis has yielded comments from the following states:

California:

Comments were received from the CA Dept. of Social Services, CA Office of the Attorney General (See legal comments below), and the CA State Controller's Office.

The CA Dept. of Social Services believes the rule will unnecessarily increase the amount of administrative burden and cost on consumers, providers, and the health care delivery system.

Pennsylvania:

The PA Dept. of the Auditor General questions the validity of the \$8 million amount that factored into the calculation of the economic significance of \$0 – \$160 million. The Auditor also noted that PA does not require mandated deductions of union dues.

New York:

The New York City Department of Consumer Affairs indicated that the proposed rule would undermine the financial and employment security of thousands of home care workers and would negatively impact access to services.

Write-in Campaigns – California, Washington, Florida

Individuals overwhelming opposed the proposed rule. These form letters cite CMS's overreach of authority designed to attack home care workers and their freedom to spend their wages as they choose.

Provider Reassignment Regulation (CMS-2413-P)
Summary of Public Comments
As of 9/12/18

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Major Decision Points/ Next Steps:

N/A

From: [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#); [Brooks, Gaysha M. \(CMS/OSORA\)](#); [Brewer, Annette M. \(CMS/OSORA\)](#)
Subject: RE: Provider Reassignment (2413-P) Final Rule Template
Date: Thursday, September 6, 2018 7:34:13 AM
Attachments: [CMS-2413-F Master Shell \(9-6-18\).doc](#)

Good Morning Chris,

Attached is the shell document for the Provider Reassignment final rule (CMS-2413-F).

From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Wednesday, September 5, 2018 3:58 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template

Hi Chris,

Cynthia Lambert-Lawson is the RDG Analyst for this rule. She will be sending you a shell document for the final rule.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, September 5, 2018 3:52 PM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: Provider Reassignment (2413-P) Final Rule Template

Hey Gaysha,

I hope this e-mail finds you in good spirits. Our analysis of the comments for 2413-P is more than halfway complete and we do not anticipate the aim of the rule changing much. I understand OSORA normally goes through the reg. text of the proposed rule and reformats the language for the final rule. We've been tasked by OCD with being ready to publish the final rule in a couple of weeks and I was wondering if the reformatting of the reg. text could be done in the next couple of days?

Thank you,

Chris Thompson
Deputy Division Director

Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Lafferty, Tiffany R. \(CMS/OSORA\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#); [Brooks, Gaysha M. \(CMS/OSORA\)](#)
Cc: [Brewer, Annette M. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Hubbard, Lisa A. \(CMS/OSORA\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#)
Subject: RE: Provider Reassignment (2413-P) Final Rule
Date: Monday, October 22, 2018 4:42:00 PM
Attachments: [CMS-2413-Final Rule.docx](#)

Good Afternoon Gaysha and Tiffany,

The attached draft final rule is being submitted for clearance.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Friday, October 19, 2018 3:31 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Chris, Just checking in to see if we can still expect your draft today. Thanks!

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, October 16, 2018 12:26 PM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Lafferty, Tiffany R.

(CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Tiffany,

We are still on track for the 10/19 date.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Boston, Beverly A. (CMS/CMCS)

Sent: Tuesday, October 16, 2018 12:22 PM

To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Thank you and Chris will let you know whether we're on track to meet the 10/19 date to OSORA.

Beverly

From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Tuesday, October 16, 2018 11:16 AM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Correct. OA understands that November will be a challenge, but they want to start there and see what HHS/OMB will agree to once we're ready to share with them for clearance.

From: Boston, Beverly A. (CMS/CMCS)
Sent: Tuesday, October 16, 2018 10:37 AM
To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Tiffany,

So the expedited schedule will be based on OA's November date correct? I know that depends on whether OMB will agree to a shorter review timeframe.

Beverly

From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Tuesday, October 16, 2018 9:28 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard,

Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Good morning Chris, We don't have a firm schedule, but I do have some timeframes. The latest that I have heard is that the final rule will indicate a January publication target on the upcoming fall Unified Agenda, but OA has asked us to continue to target November TBD. We heard from Calder that we can expect your draft by 10/19. Please let us know if that changes.

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, October 15, 2018 10:41 AM

To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Tiffany,

I wanted circle back to you to see if there has been any movement as far as the regulation schedule?

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410) 786-4044

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From: Lafferty, Tiffany R. (CMS/OSORA)

Sent: Tuesday, September 18, 2018 10:45 AM

To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA)

<Gaysha.Brooks@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Beverly, We're pending a response from Brady Brookes in OA on what the target date should be. OMB is pressing for a 90-days review; however, we understand that leadership would like it earlier. Once OA confirms direction for the target, we can develop the schedule.

Tiffany

From: Boston, Beverly A. (CMS/CMCS)

Sent: Tuesday, September 18, 2018 10:17 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Good morning,

Looping Tiffany, wanted to mention that the Administrator requested that we put this item back on this Thursday's Issues agenda although she was briefed on 9/5-- we believe she wants to know the timeframe to publish in final. We meet with our Center Directors tomorrow at 1pm and a new timeline reflecting a 10/31 (or late October) date to OSORA would be helpful.

Thanks

Beverly

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, September 17, 2018 5:11 PM

To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Gaysha,

We wanted to present a revised timeline to OCD this week. Can the timeline be revised to accommodate a 10/31/18 date to submit the rule to OSORA?

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410) 786-4044
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From: [Brewer, Annette M. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#)
Cc: [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Lafferty, Tiffany R. \(CMS/OSORA\)](#); [Brooks, Gaysha M. \(CMS/OSORA\)](#); [Hubbard, Lisa A. \(CMS/OSORA\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#)
Subject: RE: Provider Reassignment (2413-P) Final Rule
Date: Tuesday, October 23, 2018 9:34:21 AM
Attachments: [CMS-2413-F \(10-23-18\).docx](#)
[2413-F OSORA Mark-up of 10-22-18 component draft \(10-23-18\).docx](#)

Chris,

(b)(5)

Once I hear back from you, we will put the document in clearance.
Thanks,

Annette M. Brewer 

 410-786-6580 /  (b)(6) | **ADS on Mondays**

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, October 22, 2018 4:42 PM
To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule

Good Afternoon Gaysha and Tiffany,

The attached draft final rule is being submitted for clearance.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244

Phone: (410)786-4044

Mobile: (b)(6)

Fax: (410) 786-8533

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From: Lafferty, Tiffany R. (CMS/OSORA)

Sent: Friday, October 19, 2018 3:31 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Chris, Just checking in to see if we can still expect your draft today. Thanks!

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Tuesday, October 16, 2018 12:26 PM

To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Tiffany,

We are still on track for the 10/19 date.

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Boston, Beverly A. (CMS/CMCS)
Sent: Tuesday, October 16, 2018 12:22 PM
To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Thank you and Chris will let you know whether we're on track to meet the 10/19 date to OSORA.

Beverly

From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Tuesday, October 16, 2018 11:16 AM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Correct. OA understands that November will be a challenge, but they want to start there and see what HHS/OMB will agree to once we're ready to share with them for clearance.

From: Boston, Beverly A. (CMS/CMCS)

Sent: Tuesday, October 16, 2018 10:37 AM

To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Tiffany,

So the expedited schedule will be based on OA's November date correct? I know that depends on whether OMB will agree to a shorter review timeframe.

Beverly

From: Lafferty, Tiffany R. (CMS/OSORA)

Sent: Tuesday, October 16, 2018 9:28 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Good morning Chris, We don't have a firm schedule, but I do have some timeframes. The latest that I have heard is that the final rule will indicate a January publication target on the upcoming fall Unified Agenda, but OA has asked us to continue to target November TBD. We heard from Calder that we can expect your draft by 10/19. Please let us know if that changes.

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, October 15, 2018 10:41 AM

To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Tiffany,

I wanted circle back to you to see if there has been any movement as far as the regulation schedule?

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Tuesday, September 18, 2018 10:45 AM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Beverly, We're pending a response from Brady Brookes in OA on what the target date should be. OMB is pressing for a 90-days review; however, we understand that leadership would like it earlier. Once OA confirms direction for the target, we can develop the schedule.

Tiffany

From: Boston, Beverly A. (CMS/CMCS)
Sent: Tuesday, September 18, 2018 10:17 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS)

[<Jeremy.Silanskis@cms.hhs.gov>](mailto:Jeremy.Silanskis@cms.hhs.gov)

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Good morning,

Looping Tiffany, wanted to mention that the Administrator requested that we put this item back on this Thursday's Issues agenda although she was briefed on 9/5-- we believe she wants to know the timeframe to publish in final. We meet with our Center Directors tomorrow at 1pm and a new timeline reflecting a 10/31 (or late October) date to OSORA would be helpful.

Thanks

Beverly

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, September 17, 2018 5:11 PM

To: Brooks, Gaysha M. (CMS/OSORA) [<Gaysha.Brooks@cms.hhs.gov>](mailto:Gaysha.Brooks@cms.hhs.gov); Boston, Beverly A. (CMS/CMCS) [<Beverly.Boston@cms.hhs.gov>](mailto:Beverly.Boston@cms.hhs.gov)

Cc: Brewer, Annette M. (CMS/OSORA) [<Annette.Brewer@cms.hhs.gov>](mailto:Annette.Brewer@cms.hhs.gov); Lambert-Lawson, Cynthia (CMS/OSORA) [<Cynthia.Lambert-Lawson@cms.hhs.gov>](mailto:Cynthia.Lambert-Lawson@cms.hhs.gov); Silanskis, Jeremy D. (CMS/CMCS) [<Jeremy.Silanskis@cms.hhs.gov>](mailto:Jeremy.Silanskis@cms.hhs.gov)

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Gaysha,

We wanted to present a revised timeline to OCD this week. Can the timeline be revised to accommodate a 10/31/18 date to submit the rule to OSORA?

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410) 786-4044

Mobile: (b)(6)

Fax: (410) 786-8533

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Mack, Rosa \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: RE: Provider Reassignment Next Steps
Date: Monday, July 9, 2018 10:47:00 AM
Attachments: [PaymentReassignment_ProposedRule-OA-CMCS-MRG-FINAL_SV_edits v2.docx](#)
[PBB 2413-P.QAs Formatted Final v2.docx](#)

Hi Rosa,

I had a chance to look over the edits and I have no issues or concerns. Attached are clean copies with all edits accepted.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Mack, Rosa (CMS/CMCS)
Sent: Monday, July 9, 2018 9:40 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: FW: Provider Reassignment Next Steps

Hi. See attached/below.

From: Lynch, Calder (CMS/OA)
Sent: Monday, July 9, 2018 9:38 AM
To: Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>
Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>
Subject: RE: Provider Reassignment Next Steps

(b)(5)

Calder

--

Calder Lynch

Senior Counselor
Office of the Administrator
Centers for Medicare & Medicaid Services (CMS)
Washington, DC 20201
Office: (202) 619-0630

From: Mack, Rosa (CMS/CMCS)
Sent: Tuesday, June 26, 2018 6:11 PM
To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>
Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>
Subject: Re: Provider Reassignment Next Steps

Thanks. Sent these to Jeremy and Chris for a quick look over.

On Jun 26, 2018, at 5:37 PM, Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov> wrote:

(b)(5)

Calder

--

Calder Lynch

Senior Counselor
Office of the Administrator
Centers for Medicare & Medicaid Services (CMS)
Washington, DC 20201
Office: (202) 619-0630

From: Mack, Rosa (CMS/CMCS)
Sent: Tuesday, June 26, 2018 11:46 AM
To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>
Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>
Subject: RE: Provider Reassignment Next Steps

Hi there. Any chance you were able to work on this?

From: Mack, Rosa (CMS/CMCS)
Sent: Friday, June 22, 2018 4:51 PM
To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>
Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>
Subject: Re: Provider Reassignment Next Steps

Ok. Thanks!

On Jun 22, 2018, at 4:49 PM, Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov> wrote:

(b)(5)

Calder

--

Calder Lynch
Senior Counselor
Office of the Administrator
Centers for Medicare & Medicaid Services (CMS)
Washington, DC 20201
Office: (202) 619-0630

From: Mack, Rosa (CMS/CMCS)
Sent: Friday, June 22, 2018 4:12 PM
To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>
Subject: RE: Provider Reassignment Next Steps

Calder: Let me know if you have any concerns/edits to the fact sheet and/or QAs.

From: Mack, Rosa (CMS/CMCS)
Sent: Friday, June 22, 2018 10:51 AM
To: Lynch, Calder (CMS/OA) <calder.lynch@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS)

<Deidre.Gifford@cms.hhs.gov>

Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>

Subject: RE: Provider Reassignment Next Steps

Attached are the QAs and the fact sheet. OC is working on drafting the press release.

(b)(5)

From: Lynch, Calder (CMS/OA)

Sent: Friday, June 22, 2018 10:08 AM

To: Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>

Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>

Subject: Re: Provider Reassignment Next Steps

(b)(5)

Sent from my iPhone

On Jun 22, 2018, at 10:06 AM, Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov> wrote:

(b)(5)

Sara Harshman
The Center for Medicaid and CHIP Services
Desk: (202) 205-8361
Cell: (b)(6)

<PRR Fact Sheet 6-21-18 RM (CL.docx>

<PRR 2413-P QAs CL.docx>

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Mack, Rosa \(CMS/CMCS\)](#)
Subject: RE: Provider Reassignment Next Steps
Date: Wednesday, June 27, 2018 11:32:00 AM
Attachments: [PRR Fact Sheet 6-21-18 \(03\).docx](#)
[PRR 2413-P QAs CL.DOCX](#)

Hi Rosa,

Please see the attached clean copies.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Mack, Rosa (CMS/CMCS)
Sent: Wednesday, June 27, 2018 11:20 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: Provider Reassignment Next Steps

Hey-catching up on email...did you send clean docs to me?

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, June 27, 2018 11:15 AM
To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: Provider Reassignment Next Steps

Hey Calder,

(b)(5)

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: Lynch, Calder (CMS/OA)
Sent: Wednesday, June 27, 2018 10:25 AM
To: Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: Provider Reassignment Next Steps

(b)(5)

--

Calder Lynch
Senior Counselor
Office of the Administrator
Centers for Medicare & Medicaid Services (CMS)
Washington, DC 20201
Office: (202) 619-0630

From: Mack, Rosa (CMS/CMCS)
Sent: Wednesday, June 27, 2018 9:33 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: Fwd: Provider Reassignment Next Steps

Thanks, Chris!

I'm at an appointment, so adding Calder.

Begin forwarded message:

From: "Thompson, Christopher C. (CMS/CMCS)" <Christopher.Thompson@cms.hhs.gov>
Date: June 27, 2018 at 9:31:19 AM EDT
To: "Mack, Rosa (CMS/CMCS)" <Rosa.Mack@cms.hhs.gov>, "Silanskis, Jeremy D. (CMS/CMCS)" <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: Provider Reassignment Next Steps

Hi Rosa,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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Sent: Wednesday, June 27, 2018 9:05 AM
To: Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: Provider Reassignment Next Steps

Hi Rosa,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
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Office of the Administrator

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(b)(5)

Sent from my iPhone

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<Sara.Harshman@cms.hhs.gov> wrote:

(b)(5)

Sara Harshman
The Center for Medicaid and CHIP Services
Desk: (202) 205-8361
Cell: (b)(6)

Questions and Answers
Medicaid Provider Reassignment Regulation Proposed Rule
CMS-2413-P

Question 1: What does this proposed rule accomplish?

Answer 1: This proposed rule removes the regulatory text at 42 CFR 447.10(g)(4) which allows a state to reassign portions of a provider's payment to third parties for benefits such as health insurance, skills training and other benefits customary for employees.

Question 2: Why are you removing the regulatory text at 42 CFR 447.10(g)(4)?

Answer 2: We are removing the regulatory text at 42 CFR 447.10(g)(4) because the regulatory provision grants permissions that Congress has not explicitly authorized. Section 1902(a)(32) of the Social Security Act, and implementing regulations at 42 CFR 447.10, provide for a number of exceptions to the direct payment requirement, but it does not authorize the agency to create new exceptions. As such, we are proposing to remove the regulatory exception at §447.10(g)(4).

Question 3: Did CMS consider any alternatives to removing the regulatory text at 42 CFR 447.10(g)(4)?

Answer 3: Given the plain reading of the statute, we believe removing the regulatory exception is the best course of action.

Question 4: Does the removal of the regulatory text at 42 CFR 447.10(g)(4) affect all self-direct care models within the overall Medicaid program?

Answer 4: No, the removal of the regulatory text at 42 CFR 447.10(g)(4) will only affect a state's ability to reassign portions of a provider's payment connected to the rendering of services provided under Section 1905(a) authority. This will most likely affect home care or personal care workers and any other professional provider that may have a contractual relationship with a state.

Removal of the regulatory text at 42 CFR 447.10(g)(4) will not apply to payment for services rendered under 1915(c), 1915(i), 1915(j), and 1915(k) authorities, nor will it impact a state's ability to perform Financial Management Services (FMS) or secure FMS through a vendor arrangement.

Question 5: Did CMS formally track the financial impact with regard to states' application of 42 CFR 447.10(g)(4)?

Answer 5: No, CMS did not track the financial impact of 42 CFR 447.10 (g)(4), however, there was little to no increase in federal Medicaid spending as a result of §447.10(g)(4). Specifically, an increase in Medicaid spending would have required the submission of a State Plan Amendment to increase the rate paid for practitioner

Questions and Answers
Medicaid Provider Reassignment Regulation Proposed Rule
CMS-2413-P

services. To the Department's knowledge, only one state increased its rate as a direct result of §447.10(g)(4).

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Mack, Rosa \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: RE: Provider Reassignment Next Steps
Date: Wednesday, June 27, 2018 9:31:00 AM
Attachments: [PRR Fact Sheet 6-21-18 \(02\).docx](#)
[CMS-2413-P Master \(6-26-18\) passback.docx](#)
[CMS-2413-P Master \(6-26-18\) Clean Copy.docx](#)

Hi Rosa,

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Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
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Attached are the QAs and the fact sheet. OC is working on drafting the press release.

With the news that we are going to roll this into the Medicaid PI strategy announcement, should there be one release that mentions both? Or are we still working on two separate ones?

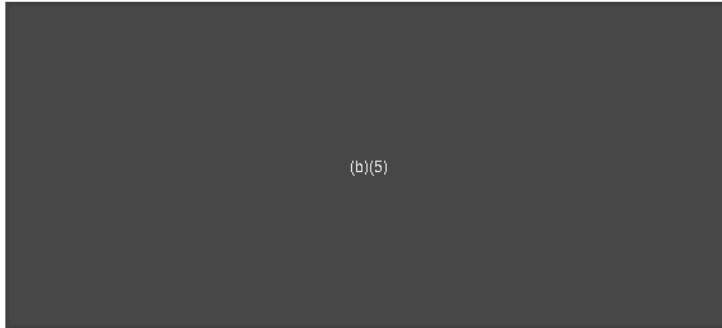
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Sent from my iPhone

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Sara Harshman
The Center for Medicaid and CHIP Services
Desk: (202) 205-8361
Cell: (b)(6)

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Subject: RE: Provider Reassignment Next Steps
Date: Wednesday, June 27, 2018 9:04:00 AM
Attachments: [PRR 2413-P QAs CL.DOCX](#)
[PRR Fact Sheet 6-21-18 \(01\).docx](#)

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Cc: [Boston, Beverly A. \(CMS/CMCS\)](#); [Wiley, Evelyn S. \(CMS/OIT\)](#)
Subject: RE: Provider Reassignment Next Steps
Date: Monday, July 9, 2018 4:54:29 PM
Attachments: [CLEARANCE Medicaid Provider Reassignment Proposed Rule Announcement.msg](#)

Here you go! OC is planning to circulate a rollout plan "soon," but I think we can call around 10. I will share the plan as soon as we get it.

(202) 403-8621
matt.salo@medicaiddirectors.org

FYI Attached are the final documents (press release and QAs) that were sent to comms clearance (comments are due back at 5 today...).

From: Fan, Kristin A. (CMS/CMCS)
Sent: Monday, July 9, 2018 4:35 PM
To: Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>
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Subject: RE: Provider Reassignment Next Steps

I can – what time and give me a number.

From: Mack, Rosa (CMS/CMCS)
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Subject: FW: Provider Reassignment Next Steps

Flagging that this is being posted tomorrow at 11:15. Can one of you give NAMD a heads-up tomorrow morning?

From: Lynch, Calder (CMS/OA)
Sent: Monday, July 9, 2018 11:27 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>
Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>

Subject: RE: Provider Reassignment Next Steps

Excellent thank you!

Calder

--

Calder Lynch

Senior Counselor

Office of the Administrator

Centers for Medicare & Medicaid Services (CMS)

Washington, DC 20201

Office: (202) 619-0630

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, July 9, 2018 11:26 AM

To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>

Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>

Subject: RE: Provider Reassignment Next Steps

Hi Calder,

(b)(5)

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410) 786-4044

Mobile: (b)(6)

Fax: (410) 786-8533

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From: Lynch, Calder (CMS/OA)
Sent: Monday, July 9, 2018 10:53 AM
To: Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>
Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMC) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: Provider Reassignment Next Steps

(b)(5)

Calder

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Calder Lynch
Senior Counselor
Office of the Administrator
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Washington, DC 20201
Office: (202) 619-0630

From: Mack, Rosa (CMS/CMCS)
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I checked in with Chris, and he has no concerns with the proposed edits. Attached are clean copies with all edits accepted.

From: Lynch, Calder (CMS/OA)
Sent: Monday, July 9, 2018 10:30 AM
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Subject: RE: Provider Reassignment Next Steps

Just searched my e-mail. Didn't find it there, or I have forgotten. So if there is evidence there that you think suffices, I stand corrected.

Thx, DG

Deidre S. Gifford, MD, MPH
Deputy Director
Center for Medicaid and CHIP Services (CMCS)
7500 Security Blvd. Baltimore, MD 21244
Phone: 410-786-3665
deidre.gifford@cms.hhs.gov

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Subject: RE: Provider Reassignment Next Steps

What about the letter from Gov. Rauner?

--

Calder Lynch

Senior Counselor
Office of the Administrator
Centers for Medicare & Medicaid Services (CMS)
Washington, DC 20201
Office: (202) 619-0630

From: Gifford, Deidre S. (CMS/CMCS)

Sent: Monday, July 9, 2018 9:49 AM

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Subject: RE: Provider Reassignment Next Steps

As long as you are aware that, if asked to produce the evidence referred to in the last question, I'm not sure what we would produce. The only thing I've ever seen was the original report from the think tank that was sent to Brian. We surveyed states in preparation for this NPRM and did not find such evidence.

Correct Kristin?

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deidre.gifford@cms.hhs.gov

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Calder

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Calder Lynch

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Office: (202) 619-0630

From: Mack, Rosa (CMS/CMCS)

Sent: Tuesday, June 26, 2018 6:11 PM

To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>

Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>

Subject: Re: Provider Reassignment Next Steps

Thanks. Sent these to Jeremy and Chris for a quick look over.

On Jun 26, 2018, at 5:37 PM, Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov> wrote:

(b)(5)

Calder

--

Calder Lynch

Senior Counselor

Office of the Administrator

Centers for Medicare & Medicaid Services (CMS)

Washington, DC 20201

Office: (202) 619-0630

From: Mack, Rosa (CMS/CMCS)

Sent: Tuesday, June 26, 2018 11:46 AM

To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>

Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>
Subject: RE: Provider Reassignment Next Steps

Hi there. Any chance you were able to work on this?

From: Mack, Rosa (CMS/CMCS)
Sent: Friday, June 22, 2018 4:51 PM
To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>
Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>
Subject: Re: Provider Reassignment Next Steps

Ok. Thanks!

On Jun 22, 2018, at 4:49 PM, Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov> wrote:

(b)(5)

Calder

--

Calder Lynch

Senior Counselor
Office of the Administrator
Centers for Medicare & Medicaid Services (CMS)
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Office: (202) 619-0630

From: Mack, Rosa (CMS/CMCS)
Sent: Friday, June 22, 2018 4:12 PM
To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>
Subject: RE: Provider Reassignment Next Steps

Calder: Let me know if you have any concerns/edits to the fact sheet and/or QAs.

From: Mack, Rosa (CMS/CMCS)
Sent: Friday, June 22, 2018 10:51 AM
To: Lynch, Calder (CMS/OA) <calder.lynch@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>
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Subject: RE: Provider Reassignment Next Steps

Attached are the QAs and the fact sheet. OC is working on drafting the press release.

With the news that we are going to roll this into the Medicaid PI strategy announcement, should there be one release that mentions both? Or are we still working on two separate ones?

From: Lynch, Calder (CMS/OA)
Sent: Friday, June 22, 2018 10:08 AM
To: Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>
Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>
Subject: Re: Provider Reassignment Next Steps

(b)(5)

Sent from my iPhone

On Jun 22, 2018, at 10:06 AM, Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov> wrote:

Here's what Calder was trying to say at the end of the meeting:

(b)(5)

Sara Harshman
The Center for Medicaid and CHIP Services
Desk: (202) 205-8361
Cell: (b)(6)

<PRR Fact Sheet 6-21-18 RM (CL.docx>

<PRR 2413-P QAs CL.docx>

Olin, Jay K. (CMS/OSORA)

From: CMS CLEARANCES
Sent: Monday, July 9, 2018 12:27 PM
Cc: Monroe, Johnathan (CMS/OC); CMS CLEARANCES
Subject: CLEARANCE: Medicaid Provider Reassignment Proposed Rule Announcement
Attachments: PRR 2413-P QAs Formatted Final v3.docx; PaymentReassignment_ProposedRule-OA-CMCS-MRG-FINAL v4.docx

Importance: High

This is for expedited clearance. Due today.

All: For your review and input. Concurrent HHS/CMS review.

Subject/Description: Medicaid Provider Reassignment Proposed Rule Announcement

CMS is proposing changes to the Medicaid Provider Reassignment Regulation that would eliminate the diversion of Medicaid payments away from providers outside of statutory exceptions.

Agency/Office: CMS/CMCS

COMMs Materials for Rollout:

- Press Release
- Internal Q&As

News Impact/Important Background: N/A

Deadline for CMS COMMS Clearance comments: Today, Monday, July 9, by 5 p.m.

Planned release date/driving event: **Federal Register posts on July 10 at 11:15 a.m.**

Media Leads: Johnathan Monroe

Regards,
Carolina Fortin-Garcia
CMS Media Relations Group Clearance
Office of Communications
202-690-6149 (o)
(b)(6) c)

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CMS Proposes Rule Change to Protect Provider Payments

Today, the Centers for Medicare and Medicaid Services (CMS) proposed changes to the Medicaid Provider Reassignment Regulation that would eliminate the diversion of Medicaid payments away from providers outside of statutory exceptions. This proposed regulatory change is designed to ensure that taxpayer dollars dedicated to providing healthcare services for low-income vulnerable Americans is not siphoned away for other purposes.

“The law is clear that Medicaid providers must be paid directly and cannot have part of their payments diverted to third parties outside of a few very specific exceptions,” said XXXXX. “This proposed rule is intended to ensure that providers receive their complete payment, and any circumstances in which a state does divert part of their payment is clearly allowed under the law.”

Section 1902(a)(32) of the Social Security Act generally prohibits States from making payments for Medicaid services to anyone but the provider. The statute provides only a few specific exceptions to this requirement, such as withholding payment due to a court order for wage garnishments, child support orders, or judgments for monies that are owed to the state.

In 2014, CMS revised the regulation to provide for a new exception to the direct payment requirement for certain providers, which primarily include independent in-home personal care workers. This new regulatory exception authorized a state to divert part of the Medicaid payment to third parties that could then be used to fund other costs on behalf of the provider. After further review, CMS has determined that the new exception created by the 2014 rule are not consistent with the statute and may have resulted in provider payments being diverted in ways that do not comport with the law, and in some cases may have occurred without the express knowledge of the provider. For example, reports indicate that some states have used the regulatory exception to authorize the deduction of union dues and related political contribution withholdings from home care provider payments, a practice known as “dues skimming.”

We are seeking comments that would inform the development of CMS guidance that would help explain which payment arrangements would be considered acceptable assignments of Medicaid payments under the current law, especially those between the states and providers.

To view the proposed rule, please visit:

Questions and Answers
Medicaid Provider Reassignment Regulation Proposed Rule
CMS-2413-P

1. What does this proposed rule accomplish?

This proposed rule removes the regulatory text at 42 CFR 447.10(g)(4) which allows a state to reassign portions of a provider's payment to third parties for benefits such as health insurance, skills training, and other benefits customary for employees.

2. Why are you removing the regulatory text at 42 CFR 447.10(g)(4)?

We are removing the regulatory text at 42 CFR 447.10(g)(4) because the regulatory provision grants permissions that Congress has foreclosed. Section 1902(a)(32) of the Social Security Act, and implementing regulations at 42 CFR 447.10, provide for a number of exceptions to the direct payment requirement, but it does not authorize the agency to create new exceptions. As such, we are proposing to remove the regulatory exception at §447.10(g)(4).

3. Did CMS consider any alternatives to removing the regulatory text at 42 CFR 447.10(g)(4)?

We considered issuing guidance to require states to formally document consent to reassign portions of a provider's payment. We also considered limiting the items for which provider reassignment could be made, however, as §447.10(g)(4) grants permissions that Congress has foreclosed, we believe removing the regulatory exception is the best course of action.

4. Does the removal of the regulatory text at 42 CFR 447.10(g)(4) affect all self-direct care models within the overall Medicaid program?

No, the removal of the regulatory text at 42 CFR 447.10(g)(4) will only affect a state's ability to reassign portions of a provider's payment connected to the rendering of services provided under Section 1905(a) authority. This will most likely affect home care or personal care workers and any other professional provider that may have a contractual relationship with a state.

Removal of the regulatory text at 42 CFR 447.10(g)(4) will not apply to payment for services rendered under 1915(c), 1915(i), 1915(j), and 1915(k) authorities, nor will it impact a state's ability to perform Financial Management Services(FMS) or secure FMS through a vendor arrangement.

5. Did CMS formally track the financial impact with regard to states' application of 42 CFR 447.10(g)(4)?

No, CMS did not track the financial impact of 42 CFR 447.10 (g)(4), however, there was little to no increase in federal Medicaid spending as a result of §447.10(g)(4). Specifically, an increase in Medicaid spending would have required the submission of a State Plan Amendment to increase the rate paid for practitioner services. To the Department's knowledge, only one state increased its rate as a direct result of §447.10(g)(4).

Questions and Answers
Medicaid Provider Reassignment Regulation Proposed Rule
CMS-2413-P

6. Does the removal of the regulatory text at 42 CFR 447.10(g)(4) eliminate the practice of union “dues skimming” among Medicaid providers?

Yes. CMS has seen evidence that some states have used the regulatory exception to authorize the deduction of union dues and related political contribution withholdings from home care provider payments, a practice known as “dues skimming.” The removal of this regulatory text removes the basis for this practice as payment of union dues does not fall within one of the clear statutory exceptions.

From: [Mack, Rosa \(CMS/CMCS\)](#)
To: [Lynch, Calder \(CMS/OA\)](#); [Gifford, Deidre S. \(CMS/CMCS\)](#)
Cc: [Hill, Timothy B. \(CMS/CMCS\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#); [Harshman, Sara \(CMS/OL\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: Provider Reassignment Next Steps
Date: Monday, July 9, 2018 10:48:26 AM
Attachments: [PaymentReassignment_ProposedRule-OA-CMCS-MRG-FINAL_SV_edits_v2.docx](#)
[PBR 2413-P QAs Formatted Final v2.docx](#)

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(b)(5)

Calder

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Thx, DG

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Sent: Friday, June 22, 2018 4:51 PM
To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>
Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>
Subject: Re: Provider Reassignment Next Steps

Ok. Thanks!

On Jun 22, 2018, at 4:49 PM, Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov> wrote:

(b)(5)

Calder

--

Calder Lynch

Senior Counselor
Office of the Administrator
Centers for Medicare & Medicaid Services (CMS)
Washington, DC 20201
Office: (202) 619-0630

From: Mack, Rosa (CMS/CMCS)
Sent: Friday, June 22, 2018 4:12 PM
To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>
Subject: RE: Provider Reassignment Next Steps

Calder: Let me know if you have any concerns/edits to the fact sheet and/or QAs.

From: Mack, Rosa (CMS/CMCS)
Sent: Friday, June 22, 2018 10:51 AM
To: Lynch, Calder (CMS/OA) <calder.lynch@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>
Subject: RE: Provider Reassignment Next Steps

Attached are the QAs and the fact sheet. OC is working on drafting the press release.

With the news that we are going to roll this into the Medicaid PI strategy announcement, should there be one release that mentions both? Or are we still working on two separate ones?

From: Lynch, Calder (CMS/OA)
Sent: Friday, June 22, 2018 10:08 AM
To: Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>
Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>
Subject: Re: Provider Reassignment Next Steps

(b)(5)

Sent from my iPhone

On Jun 22, 2018, at 10:06 AM, Harshman, Sara (CMS/OL)
<Sara.Harshman@cms.hhs.gov> wrote:

Here's what Calder was trying to say at the end of the meeting:

(b)(5)

Sara Harshman
The Center for Medicaid and CHIP Services
Desk: (202) 205-8361
Cell: (b)(6)

<PRR Fact Sheet 6-21-18 RM (CL.docx)>

<PRR 2413-P QAs CL.docx>

CMS Proposes Rule Change to Protect Provider Payments

Today, the Centers for Medicare and Medicaid Services (CMS) proposed changes to the Medicaid Provider Reassignment Regulation that would eliminate the diversion of Medicaid payments away from providers outside of statutory exceptions. This proposed regulatory change is designed to ensure that taxpayer dollars dedicated to providing healthcare services for low-income vulnerable Americans is not siphoned away for other purposes.

“The law is clear that Medicaid providers must be paid directly and cannot have part of their payments diverted to third parties outside of a few very specific exceptions,” said XXXXX. “This proposed rule is intended to ensure that providers receive their complete payment, and any circumstances in which a state does divert part of their payment is clearly allowed under the law.”

Section 1902(a)(32) of the Social Security Act generally prohibits States from making payments for Medicaid services to anyone but the provider. The statute provides only a few specific exceptions to this requirement, such as withholding payment due to court order for circumstances like wage garnishment.

In 2014, CMS revised the regulation to provide for a new exception to the direct payment requirement for certain providers, which primarily include independent in-home personal care workers. This new regulatory exception authorized a state to divert part of the Medicaid payment to third parties that could then be used to fund other costs on behalf of the provider. After further review, CMS has determined that the new exception created by the 2014 rule are not consistent with the statute and may have resulted in provider payments being diverted in ways that do not comport with the law, and in some cases may have occurred without the express knowledge of the provider. For example, reports indicate that some states have used the regulatory exception to authorize the deduction of union dues and related political contribution withholdings from home care provider payments, a practice known as “dues skimming.”

We are seeking comments that would inform the development of CMS guidance that would help explain which payment arrangements would be considered acceptable assignments of Medicaid payments under the current law, especially those between the states and providers.

To view the proposed rule, please visit:

Questions and Answers
Medicaid Provider Reassignment Regulation Proposed Rule
CMS-2413-P

1. What does this proposed rule accomplish?

This proposed rule removes the regulatory text at 42 CFR 447.10(g)(4) which allows a state to reassign portions of a provider's payment to third parties for benefits such as health insurance, skills training, and other benefits customary for employees.

2. Why are you removing the regulatory text at 42 CFR 447.10(g)(4)?

We are removing the regulatory text at 42 CFR 447.10(g)(4) because the regulatory provision grants permissions that Congress has foreclosed. Section 1902(a)(32) of the Social Security Act, and implementing regulations at 42 CFR 447.10, provide for a number of exceptions to the direct payment requirement, but it does not authorize the agency to create new exceptions. As such, we are proposing to remove the regulatory exception at §447.10(g)(4).

3. Did CMS consider any alternatives to removing the regulatory text at 42 CFR 447.10(g)(4)?

We considered issuing guidance to require states to formally document consent to reassign portions of a provider's payment. We also considered limiting the items for which provider reassignment could be made, however, as §447.10(g)(4) grants permissions that Congress has foreclosed, we believe removing the regulatory exception is the best course of action.

4. Does the removal of the regulatory text at 42 CFR 447.10(g)(4) affect all self-direct care models within the overall Medicaid program?

No, the removal of the regulatory text at 42 CFR 447.10(g)(4) will only affect a state's ability to reassign portions of a provider's payment connected to the rendering of services provided under Section 1905(a) authority. This will most likely affect home care or personal care workers and any other professional provider that may have a contractual relationship with a state.

Removal of the regulatory text at 42 CFR 447.10(g)(4) will not apply to payment for services rendered under 1915(c), 1915(i), 1915(j), and 1915(k) authorities, nor will it impact a state's ability to perform Financial Management Services(FMS) or secure FMS through a vendor arrangement.

5. Did CMS formally track the financial impact with regard to states' application of 42 CFR 447.10(g)(4)?

No, CMS did not track the financial impact of 42 CFR 447.10 (g)(4), however, there was little to no increase in federal Medicaid spending as a result of §447.10(g)(4). Specifically, an increase in Medicaid spending would have required the submission of a State Plan Amendment to increase the rate paid for practitioner services. To the Department's knowledge, only one state increased its rate as a direct result of §447.10(g)(4).

Questions and Answers
Medicaid Provider Reassignment Regulation Proposed Rule
CMS-2413-P

6. Does the removal of the regulatory text at 42 CFR 447.10(g)(4) eliminate the practice of union “dues skimming” among Medicaid providers?

Yes. CMS has seen evidence that some states have used the regulatory exception to authorize the deduction of union dues and related political contribution withholdings from home care provider payments, a practice known as “dues skimming.” The removal of this regulatory text removes the basis for this practice as payment of union dues does not fall within one of the clear statutory exceptions.

DEPARTMENT OF HEALTH & HUMAN SERVICES
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Mail Stop N2-20-16
Baltimore, Maryland 21244-1850



Office of Strategic Operations and Regulatory Affairs/Freedom of Information Group

Refer to: Control Number 101620187075 and PIN Z7RV

RE: 18-cv-3010-TNM

July 12, 2019

Alantris Muhammad
Service Employees International Union
1800 Massachusetts Avenue, NW
Washington, DC 20036

Dear Ms. Muhammad:

This letter is the third interim response to your Freedom of Information Act (5 U.S.C. § 552) request of 10/12/2018, which you sent to the Centers for Medicare & Medicaid Services. Within your correspondence, you requested access to the following records:

1. All records reflecting communications (including emails, email attachments, text messages, Slack messages, encrypted messages, telephone call logs, calendar invitations/entries, meeting notices, meeting agendas, informational material, draft legislation, talking points, any handwritten or electronic notes taken during any responsive communications, summaries of any responsive communications, or other materials) between: (a) Seema Verma, (b) Tim Hill, (c) Kristin Fan, (d) Janel Freeze, (e) Jeremy Silanskis, (f) Christopher Thompson; and any of the following entities or individuals:

- Freedom Foundation:
 - Including Maxford Nelsen, or
 - Individuals using emails ending in @freedomfoundation.com
- National Right to Work Legal Defense Foundation
 - William L. Messenger, or
 - Individual using emails ending in @nrlw.org
- State Policy Network
 - Including F. Vincent Vernuccio, Jennifer Butler, Jeremy Lott, or
 - Individuals using emails ending in @spn.org
- Illinois Policy Institute
 - Including Kristina Rasmussen, or
 - Individuals using emails ending in @illinoispolicy.org
- Mackinac Center for Public Policy

- Including Michael Reitz, or
 - Individuals using emails ending in@mackinac.org
- Capital Research Center
 - Including individuals using emails ending in @capitalresearch.org
- Free State Foundation
 - Including individuals using emails ending in @freestatefoundation.org
- Maciver Institute
 - Including individuals using emails ending in @maciverinstitute.com
- (Center of the) American Experiment
 - Including Kim Crockett, or
 - Individuals using emails ending in @americanexperimentl.org
- Office of Gov. Bruce Rauner
 - Including individuals using emails ending in @illinois.gov
- Rep. Cathy McMorris Rodgers or staff working for Rep. McMorris Rodgers
- Sen. Ron Johnson or staff working for Senator Johnson's personal office or on the Homeland Security and Government Affairs Committee.
- Mitchell Law PLLC or Jonathan F. Mitchell

2. All records reflecting communications (including emails, email attachments, text messages, slack messages, encrypted messages, telephone call logs, calendar invitations/entries, meeting notices, meeting agendas, informational material, draft legislation, talking points, any handwritten or electronic notes taken during any responsive communications, summaries of all responsive communications, or other materials) to, from, or copying (a) Seema Verma, (b) Tim Hill, (c) Kristen Fall, (d) Janel Freeze, (e) Jeremy Silanskis, or (f) Christopher Thompson; that contain any of the following terms:

- SEIU
- 775
- skim
- Dues
- * Protect providers*
- Harris v. Quinn
- Harris v. Quinn
- Janus
- "Union dues"
- "Home care dues"
- "Dues guidance"
- "Dues rule"
- Reassignment
- "Home care workers"
- Pam Harris
- Steven Glossip
- Rob Haynes
- Pat Haynes

- Catherine Hunter
- Jennifer Parrish
- Brad Boardman
- Rosella Home
- Sandra LaCelle
- Ben Olsen
- Tammy Olsen
- Mary Jane Olson
- Michelle Peterson
- Miranda Thorpe

After careful review of the documents submitted to me and processed for this third interim response, a total of 626 pages, I have determined to release them to you, as enclosed. One hundred and seventy-three (172) pages are released to you in their entirety. However, I am denying you access to portions of 436 pages pursuant to Exemptions 5 and/or 6 of the FOIA (5 U.S.C. §§ 552(b)(5) and/or (6)). Finally, an additional pages are denied in full pursuant to Exemption 5 of the FOIA (5 U.S.C. § 552(b)(5)).

Exemption 5 of the FOIA permits the withholding of inter-agency or intra-agency memorandums or letters that would not be available by law to a party in litigation with the agency.

Exemption 6 of the FOIA permits a Federal agency to withhold information contained in personnel and medical files and similar files the disclosure of which would “constitute a clearly unwarranted invasion of personal privacy.” I have weighed the public interest in disclosure (which the Supreme Court has held to be limited in this context to the public interest that would be served by shedding light in the agency’s performance of its statutory duties) against the harm to the privacy of the individuals identified in these records and have concluded that the privacy interest of the subject individuals outweighs the public interest in disclosure in this particular matter.

Sincerely yours,



Hugh Gilmore
Director

Freedom of Information Group

Enclosure

From: [Farrell, Caroline \(HHS/OGC\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: Phone conversation tomorrow re. (b)(5)
Attachments: [invite.ics](#)

From: [Farrell, Caroline \(HHS/OGC\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: Phone conversation tomorrow re. (b)(5)
Attachments: [invite.ics](#)

From: [Farrell, Caroline \(HHS/OGC\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: Phone conversation tomorrow re. (b)(5)
Attachments: [invite.ics](#)

From: [Farrell, Caroline \(HHS/OGC\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: Provider Reassignment Final Rule - Legal Comments - CA Lawsuit
Date: Thursday, October 25, 2018 3:37:30 PM
Attachments: [invite.ics](#)

From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

From: [Brumer, Jonathan \(HHS/OGC\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

From: [Farrell, Caroline \(HHS/OGC\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

From: [Popp, Dawn \(HHS/OGC\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

From: [Keating, Gerard \(HHS/OGC\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: FW: CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: HOLD: PRR - Analysis of Themes

From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: HOLD: PRR - Analysis of Themes

From: [Popp, Dawn \(HHS/OGC\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: Provider Reassignment Final Rule - Legal Comments - CA Lawsuit

From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: Provider Reassignment Final Rule - Legal Comments - CA Lawsuit

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Lyles, Tia \(CMS/CMCS\)](#)
Subject: Accepted: PRR - Extended if Needed

From: [Sabir, Jeremiah A. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR - Analysis of Themes

From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR - OGC Edits- FMS

From: [Popp, Dawn \(HHS/OGC\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR - OGC Edits- FMS

From: [Farrell, Caroline \(HHS/OGC\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR - OGC Edits- FMS

From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR Comment Analysis - 8/3/16 CIB - references to 42 CFR 447.10(g)(4)

From: [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR Comment Analysis - 8/3/16 CIB - references to 42 CFR 447.10(g)(4)

From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR Comment and Responses

From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR Comment and Responses

From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR Comments and Responses

From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR Comments and Responses

From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR Comments and Responses

When: Thu, Oct 11, 2018, 1:00 PM
Where: My Office

From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR Comments and Responses

When: Wed, Oct 10, 2018, 3:00 PM
Where: CMS S3-20-01

From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR Comments and Responses

From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR Comments and Responses

From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR Comments and Responses

From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR Comments and Responses

From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR Comments and Responses

From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR Comments and Responses

From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR Comments and Responses

From: [Sabir, Jeremiah A. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR Final Rule - DEHPG Clearance

From: [Lyles, Tia \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR Final Rule - DEHPG Clearance

From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR Final Rule - DEHPG Clearance

From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR Final Rule - DEHPG Clearance

When: Wed, Nov 21, 2018, 3:00 PM
Where: CMS S3-06-11

From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR OGC Comments

From: [Lyles, Tia \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR OGC Comments

From: [Lyles, Tia \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR OGC Comments

From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR OGC Comments

From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR OGC Comments

From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR OGC Comments

From: [Sabir, Jeremiah A. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR OGC Comments

From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR Themes

From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR Themes

From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR Themes

From: [Motley, Danielle O. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR: OGC Comments

From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR: OGC Comments

From: [Lyles, Tia \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR: OGC Comments

From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR: OGC Comments

From: [Stahlecker, Avery \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR: OGC Comments

From: [Sabir, Jeremiah A. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: PRR: OGC Comments

From: [Farrell, Caroline \(HHS/OGC\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: Reassignment of Medicaid Provider Claims (CMS-2413-F) *** OGC Comments ***

From: [Farrell, Caroline \(HHS/OGC\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Accepted: Reassignment of Medicaid Provider Claims (CMS-2413-F) *** OGC Comments ***

From: [Freeze, Janet G. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Automatic reply: DUE MON 11/5: HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F
Date: Friday, November 2, 2018 3:45:04 PM

Hello-

I am out of the office the until 11/06/2018.

If your matter is urgent, please contact Evelyn Wiley at evelyn.wiley@cms.hhs.gov.

Thank you.

From: [Lafferty, Tiffany R. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Automatic reply: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Date: Monday, December 3, 2018 11:17:50 AM

Hello, I am not in the office on Mondays. If you need immediate assistance, please contact Lisa Hubbard at lisa.hubbard@cms.hhs.gov; otherwise, I will respond on Tuesday, if needed.

From: [Brewer, Annette M. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Automatic reply: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P
Date: Thursday, March 22, 2018 12:15:57 PM

I am currently out of the office and will not have access to email. I am scheduled to return on a Monday, March 26th.

If you require immediate assistance, please contact
Gaysha Brooks @ Gaysha.Brooks@cms.hhs.gov.

Thank you.

From: [Brewer, Annette M. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Automatic reply: New Medicaid NPRM: Provider Payment Reassignment
Date: Friday, March 16, 2018 8:47:50 AM

I am currently out of the office and will not have access to email.

If you require immediate assistance, please contact
Gaysha Brooks @ Gaysha.Brooks@cms.hhs.gov.

Thank you.

From: [Lafferty, Tiffany R. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Automatic reply: Provider Reassignment (2413-P) Final Rule
Date: Monday, October 22, 2018 4:42:28 PM

Hello, I am not in the office on Mondays. If you need immediate assistance, please contact Lisa Hubbard at lisa.hubbard@cms.hhs.gov; otherwise, I will respond when I can, if needed.

From: [Sciulli, Margherita R. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Automatic reply: Provider Reimbursement Reassignment NPRM and
Date: Tuesday, June 5, 2018 4:03:10 PM

(b)(5)

I am out of the office. If you need immediate assistance, please contact Kathy Poisal at 410.786.5940.

Thank you!

From: [Poisal, Kathryn J. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Automatic reply: Provider Reimbursement Reassignment NPRM and
Date: Monday, June 4, 2018 5:20:12 PM

(b)(5)

I am currently out of the office, returning on Tuesday, June 5th.

If you need immediate assistance that cannot wait until Tuesday, please contact:

for 1915(c) HCBS waivers - Ralph Lollar or George Failla

for 1915(i) State plan HCBS - Deanna Clark

From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Automatic reply: PRR - OGC Edits- FMS
Date: Monday, November 19, 2018 11:05:15 AM

Hello - I am unexpectedly out of the office on Monday 11/19.

If you need immediate assistance, please contact Andrew Badaracco at 410-786-4589 or Andrew.Badaracco@cms.hhs.gov.

From: [Johns, Hamilton J. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Automatic reply: PRR Comments and Responses
Date: Monday, October 15, 2018 8:50:48 AM

Out of the office today attending a conference

From: [Sabir, Jeremiah A. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Automatic reply: PRR Comments and Responses
Date: Friday, October 5, 2018 3:51:49 PM

Hello,

I am out of the office until 10/9/2018. I will respond to your message when I return. If your matter is urgent, please contact:

Chris Thompson: 410-786-4044 or Christopher.Thompson@cms.hhs.gov

From: [Lollar, Ralph F. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Automatic reply: PRR Final Rule - DEHPG Clearance
Date: Wednesday, November 14, 2018 11:03:45 AM

I will be out of the office through Friday, November 16, 2018, with limited access to email. In my absence please contact my Deputy Director, George Failla at George.Failla@cms.hhs.gov. George can also be reached at 410-786-7561.

Thank you and have a good day,

Ralph

From: [Freeze, Janet G. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Automatic reply: PRR Final Rule
Date: Friday, October 19, 2018 12:15:34 PM

Hello-

I am out of the office the until 10/23/2018.

If your matter is urgent, please contact Evelyn Wiley at evelyn.wiley@cms.hhs.gov.

Thank you.

From: [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Automatic reply: PRR Final Rule
Date: Friday, October 19, 2018 12:15:25 PM

Hello -

I am out of the office. I will respond to your email as soon as I return. If you need immediate assistance, please contact Chris Thompson: Christopher.Thompson@cms.hhs.gov.

Thanks.

From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Automatic reply: PRR OGC comments (b)(5)
Date: Tuesday, November 27, 2018 4:38:45 PM

Hello- I am currently out of the office. I will respond to emails and calls when I return on Thursday November 29th, 2018. If you need immediate assistance with IAP related issues, please contact Negussie Tilahun at 410-786-2058. For all other issues please contact Jeremy Silanskis at 410-786-1592 or Chris Thompson at 410-786-4044.

Thank you,

Asher Mikow

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Farrell, Caroline \(HHS/OGC\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#)
Cc: [Popp, Dawn \(HHS/OGC\)](#); [Brumer, Jonathan \(HHS/OGC\)](#)
Subject: CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

Hey Caroline, Dawn, and Jonathan,

Please let me know if this time does not work for you all.

Thank you,

From: Farrell, Caroline (HHS/OGC)
Sent: Thursday, November 1, 2018 4:51 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> >
Cc: Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov <mailto:Dawn.Popp@hhs.gov> >; Brumer, Jonathan (HHS/OGC) <Jonathan.Brumer@HHS.GOV <mailto:Jonathan.Brumer@HHS.GOV> >
Subject: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

Chris,

We met with DOJ today and it is looking like we will need to discuss the following questions with CMCS:

(b)(5)

Might it be possible to set up another appointment to meet about these questions?

Thank you,
Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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CHRISTOPHER THOMPSON has scheduled this WebEx meeting.

CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)
Host: CHRISTOPHER THOMPSON

Access Information

1. Please call the following number:
WebEx: (b)(5)
2. Follow the instructions you hear on the phone.

Your WebEx Meeting Number: (b)(5)

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5. Follow the instructions that appear on your screen.

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Farrell, Caroline \(HHS/OGC\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#)
Cc: [Popp, Dawn \(HHS/OGC\)](#); [Brumer, Jonathan \(HHS/OGC\)](#)
Subject: CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

Hey Caroline, Dawn, and Jonathan,

Please let me know if this time does not work for you all.

Thank you,

From: Farrell, Caroline (HHS/OGC)
Sent: Thursday, November 1, 2018 4:51 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> >
Cc: Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov <mailto:Dawn.Popp@hhs.gov> >; Brumer, Jonathan (HHS/OGC) <Jonathan.Brumer@HHS.GOV <mailto:Jonathan.Brumer@HHS.GOV> >
Subject: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

Chris,

We met with DOJ today and it is looking like we will need to discuss the following questions with CMCS:

(b)(5)

Might it be possible to set up another appointment to meet about these questions?

Thank you,
Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)
Host: CHRISTOPHER THOMPSON

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The meetings.cms.gov team

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Canceled: PRR Final Rule - DEHPG Clearance
Importance: High

Hi Ralph, Melissa, and Kenya,

We would like to walk through our responses to your comments on the PRR Final Rule.
DO NOT DELETE OR CHANGE ANY OF THE TEXT BELOW THIS LINE

CHRISTOPHER THOMPSON has scheduled this WebEx meeting.

PRR Final Rule - DEHPG Clearance
Host: CHRISTOPHER THOMPSON

Access Information

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WebEx: (b)(5)
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Enter Meeting Number: Use Meeting WebEx Number provided above.

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2. If requested, enter your name and email address.
3. If a password is required, enter the meeting password: (This meeting does not require a password.)
4. Click "Join".
5. Follow the instructions that appear on your screen.

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Canceled: PRR: OGC Comments
Importance: High

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Friday, November 9, 2018 12:05 PM
To: Lyles, Tia (CMS/CMCS) <tia.lyles@cms.hhs.gov> >; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov> >; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov> >; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov> >; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov> >; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov> >
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov> >
Subject: FW: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

FYI..... clearance comments from OGC. I will set up an appointment for us to discuss!

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Farrell, Caroline (HHS/OGC)
Sent: Friday, November 9, 2018 11:17 AM
To: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov> >; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov> >; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov> >; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov> >; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov> >; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov> >; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov> >
Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov> >; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov> >; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov> >
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good morning,

Please see attached for OGC's comment on the draft Medicaid Provider Payment Reassignment NPRM.

Please let us know if you have questions and whether you would like to have a call to discuss our comments.

Thank you,

Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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From: Brewer, Annette M. (CMS/OSORA)
Sent: Tuesday, November 6, 2018 11:18 AM
To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov> >; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov> >; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov> >; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov> >; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov> >; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov> >; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov> >
Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov> >; Brooks, Gaysha M. (CMS/OSORA)

<Gaysha.Brooks@cms.hhs.gov <mailto:Gaysha.Brooks@cms.hhs.gov> >; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov <mailto:Cynthia.Lambert-Lawson@cms.hhs.gov> >
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Importance: High

Hi Caroline,

Any updates on when we can expect OGC comments? With the rule scheduled for publication this month, we really need to revise the rule based on CMS comments and move to HHS asap. Any help would be appreciated.

Thanks,

Annette M. Brewer -
' 410-786-6580 (b)(6) ADS on Mondays

From: Farrell, Caroline (HHS/OGC)
Sent: Friday, November 2, 2018 3:26 PM
To: CMS Coordination_Regs_OSORA <Coordination_Regs_OSORA@cms.hhs.gov <mailto:Coordination_Regs_OSORA@cms.hhs.gov> >; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> >; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov <mailto:Jeremy.Silanskis@cms.hhs.gov> >; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov <mailto:Beverly.Boston@cms.hhs.gov> >; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov <mailto:Janet.Freeze@cms.hhs.gov> >; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov <mailto:Kristin.Fan@cms.hhs.gov> >; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov <mailto:Cynthia.Lambert-Lawson@cms.hhs.gov> >; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov <mailto:Gaysha.Brooks@cms.hhs.gov> >; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov <mailto:Dawn.Popp@hhs.gov> >
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov <mailto:Annette.Brewer@cms.hhs.gov> >
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

OGC is still working on this review and should be able to provide comments next week. Please check in early next week if you want a more specific update.

Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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From: CMS Coordination_Regs_OSORA
Sent: Friday, November 2, 2018 2:35 PM
To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov <mailto:Caroline.Farrell@hhs.gov> >; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> >; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov <mailto:Jeremy.Silanskis@cms.hhs.gov> >; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov <mailto:Beverly.Boston@cms.hhs.gov> >; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov <mailto:Janet.Freeze@cms.hhs.gov> >; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov <mailto:Kristin.Fan@cms.hhs.gov> >; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov <mailto:Cynthia.Lambert-Lawson@cms.hhs.gov> >; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov <mailto:Gaysha.Brooks@cms.hhs.gov> >; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov <mailto:Dawn.Popp@hhs.gov> >
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov <mailto:Annette.Brewer@cms.hhs.gov> >
Subject: FW: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Importance: High

Note to OGC: Clearance for CMS-2413-F was due on Tuesday, October 30, 2018. We are still pending clearance/comments from OGC. Please provide us with an update as soon as possible.

Thanks

From: CMS Coordination_Regs_OSORA
Sent: Wednesday, October 31, 2018 9:53 AM
To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov <mailto:Reg_Coordinators@cms.hhs.gov> >; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov <mailto:CMSCMSO_REGS@cms.hhs.gov> >; CMS OLClearances <OLClearances@cms.hhs.gov <mailto:OLClearances@cms.hhs.gov> >; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> >; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov <mailto:Jeremy.Silanskis@cms.hhs.gov> >; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov <mailto:Beverly.Boston@cms.hhs.gov> >; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov <mailto:Mitch.Bryman@cms.hhs.gov> >; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov <mailto:Nancy.Zhang@cms.hhs.gov> >; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov <mailto:Cynthia.Lambert-Lawson@cms.hhs.gov> >; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov <mailto:Gaysha.Brooks@cms.hhs.gov> >; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov <mailto:Janet.Freeze@cms.hhs.gov> >; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov <mailto:Kristin.Fan@cms.hhs.gov> >; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov <mailto:Caroline.Farrell@hhs.gov> >
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov <mailto:Annette.Brewer@cms.hhs.gov> >
Subject: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Importance: High

Good Morning,

This is a friendly reminder that the clearance for CMS-2413-F are now overdue. Clearances were due October 30, 2018. Thank you.

From: CMS Coordination_Regs_OSORA
Sent: Tuesday, October 23, 2018 5:06 PM
To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov <mailto:Reg_Coordinators@cms.hhs.gov>>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov <mailto:CMSCMSO_REGS@cms.hhs.gov>>; CMS OLClearances <OLClearances@cms.hhs.gov <mailto:OLClearances@cms.hhs.gov>>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov>>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov <mailto:Jeremy.Silanskis@cms.hhs.gov>>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov <mailto:Beverly.Boston@cms.hhs.gov>>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov <mailto:Mitch.Bryman@cms.hhs.gov>>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov <mailto:Nancy.Zhang@cms.hhs.gov>>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov <mailto:Cynthia.Lambert-Lawson@cms.hhs.gov>>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov <mailto:Gaysha.Brooks@cms.hhs.gov>>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov <mailto:Janet.Freeze@cms.hhs.gov>>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov <mailto:Kristin.Fan@cms.hhs.gov>>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov <mailto:Caroline.Farrell@hhs.gov>>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov <mailto:Annette.Brewer@cms.hhs.gov>>
Subject: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Importance: High

CMS-2413-F: Medicaid Program; Reassignment of Medicaid Provider Claims

Clearance is requested by 5 p.m., Tuesday, October 30, 2018.

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The subject document is attached for your review and clearance. If you are the regulations coordinator, please clear the document through all divisions in your center or office, even if your center or office is the lead policy component for the document. Please forward your responses to the CMS Coordination_Regs_OSORA Outlook mailbox by 5 p.m., Tuesday, October 30, 2018. Electronic markups should include redline and strikeouts of the additions and deletions by using the "Track Changes" feature in MS Word. If you are providing comments electronically, save your comments with your component's acronym in parentheses at the end of the file name (for example, if the component is CBC, then the file would be saved as 2413-F Preamble (CCSQ).doc). It would also be helpful if you would suggest language that would respond to your comment to insert into the document.

(b)(5)

If you have any questions regarding submission of clearances and comments, you may contact Cynthia Lambert-Lawson (x6-1366). Please call Chris Thompson (X6-4044) for policy related questions.

This final rule is scheduled for publication on November 30, 2018. Therefore, it is important that we receive all clearances timely. Thank you, in advance, for your prompt response.

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CHRISTOPHER THOMPSON has scheduled this WebEx meeting.

PRR: OGC Comments
Host: CHRISTOPHER THOMPSON

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3. If a password is required, enter the meeting password: (This meeting does not require a password.)
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(b)(5)

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From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Declined: PRR Comment Analysis - 8/3/16 CIB - references to 42 CFR 447.10(g)(4)

I have a conflict with an internal with my RO.

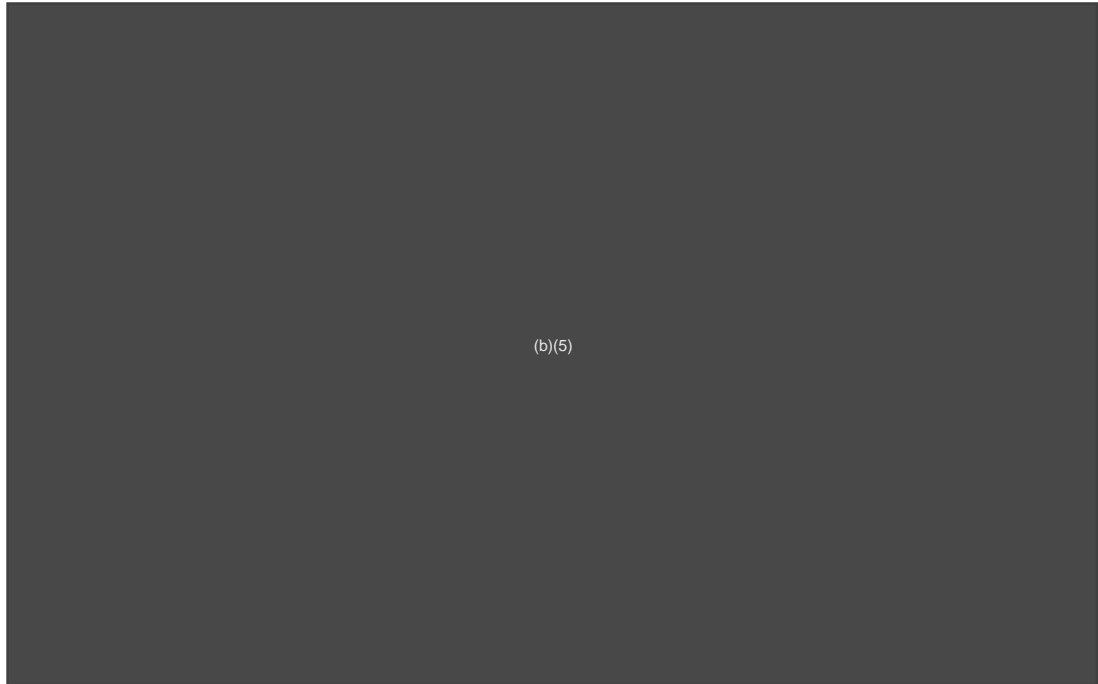
From: [Harris, Melissa L. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Declined: PRR Comment Analysis - 8/3/16 CIB - references to 42 CFR 447.10(g)(4)

Hi Chris, I'm not available at this time, but if others in DE are, ok to move ahead. I'm in Chicago for the rest of the week, and booked up tomorrow morning.

From: [Farrell, Caroline \(HHS/OGC\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Cc: [Popp, Dawn \(HHS/OGC\)](#); [Brumer, Jonathan \(HHS/OGC\)](#)
Subject: Follow up questions re. 42 C.F.R. section 447.10(g)(4)
Date: Thursday, November 1, 2018 4:51:29 PM

Chris,

We met with DOJ today and it is looking like we will need to discuss the following questions with CMCS:



Might it be possible to set up another appointment to meet about these questions?

Thank you,

Caroline L. Farrell

Attorney

Office of the General Counsel, CMS Division

United States Department of Health and Human Services

(202) 708 - 9735

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From: [Fan, Kristin A. \(CMS/CMCS\)](#)
To: [Freeze, Janet G. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Cc: [Boston, Beverly A. \(CMS/CMCS\)](#)
Subject: FW: Aliser v. SEIU California, No. 2:18-cv-02574-MCE-CKD
Date: Monday, October 15, 2018 2:22:49 PM

(b)(5)

From: Lynch, Calder (CMS/OA)
Sent: Monday, October 15, 2018 11:36 AM
To: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Subject: RE: Aliser v. SEIU California, No. 2:18-cv-02574-MCE-CKD

(b)(5)

--

Calder Lynch

Senior Counselor
Office of the Administrator
Centers for Medicare & Medicaid Services (CMS)
Washington, DC 20201
Office: (202) 619-0630

From: Cleary, Kelly (HHS/OGC)
Sent: Monday, October 15, 2018 10:02 AM
To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>
Cc: Stimson, Brian (HHS/OGC) <Brian.Stimson@hhs.gov>
Subject: FW: Aliser v. SEIU California, No. 2:18-cv-02574-MCE-CKD

Calder/Tim –

(b)(5)

Kelly Cleary
Deputy General Counsel & Chief Legal Officer – CMS
U.S. Department of Health & Human Services
Office: (202) 619-0300
Cell: (b)(6)

PRIVILEGED & CONFIDENTIAL

ATTORNEY-CLIENT COMMUNICATION

From: Lyons, Susan (HHS/OGC)
Sent: Monday, October 15, 2018 9:24 AM
To: Cleary, Kelly (HHS/OGC) <Kelly.Cleary@hhs.gov>
Cc: Hoffman, Janice (HHS/OGC) <Janice.Hoffman@HHS.GOV>
Subject: FW: Aliser v. SEIU California, No. 2:18-cv-02574-MCE-CKD

Kelly,

(b)(5)

Susan

From: Knapp, Michael (CIV) <Michael.Knapp@usdoj.gov>
Sent: Friday, October 12, 2018 3:55 PM
To: Lyons, Susan (HHS/OGC) <Susan.Lyons@HHS.GOV>
Cc: Brumer, Jonathan (HHS/OGC) <Jonathan.Brumer@HHS.GOV>; Keating, Gerard (HHS/OGC) <Gerard.Keating@HHS.GOV>
Subject: RE: Aliser v. SEIU California, No. 2:18-cv-02574-MCE-CKD

Hi all,

(b)(5)

Thanks,

Mike

From: Knapp, Michael (CIV)
Sent: Tuesday, October 09, 2018 4:33 PM
To: 'Lyons, Susan (HHS/OGC)' <Susan.Lyons@HHS.GOV>
Cc: Brumer, Jonathan (HHS/OGC) <Jonathan.Brumer@HHS.GOV>; Keating, Gerard (HHS/OGC) <Gerard.Keating@HHS.GOV>
Subject: RE: Aliser v. SEIU California, No. 2:18-cv-02574-MCE-CKD

Hi all,

(b)(5)

Thanks,

Mike

Michael Knapp (California Bar No. 314104)
Trial Attorney, Federal Programs Branch
U.S. Department of Justice, Civil Division
1100 L Street, NW, Room 11304
Washington, DC 20005
Tel.: (202) 305-8613
Email: Michael.Knapp@usdoj.gov

From: Lyons, Susan (HHS/OGC) [<mailto:Susan.Lyons@HHS.GOV>]
Sent: Tuesday, October 09, 2018 12:09 PM
To: Knapp, Michael (CIV) <mknapp@CIV.USDOJ.GOV>
Cc: Brumer, Jonathan (HHS/OGC) <Jonathan.Brumer@HHS.GOV>; Keating, Gerard (HHS/OGC) <Gerard.Keating@HHS.GOV>
Subject: RE: Aliser v. SEIU California, No. 2:18-cv-02574-MCE-CKD

Thank you.

From: Knapp, Michael (CIV) <Michael.Knapp@usdoj.gov>
Sent: Tuesday, October 9, 2018 12:03 PM
To: Lyons, Susan (HHS/OGC) <Susan.Lyons@HHS.GOV>
Cc: Brumer, Jonathan (HHS/OGC) <Jonathan.Brumer@HHS.GOV>; Keating, Gerard (HHS/OGC) <Gerard.Keating@HHS.GOV>
Subject: RE: Aliser v. SEIU California, No. 2:18-cv-02574-MCE-CKD

Hi Susan,

(b)(5)

Thanks,

Mike

Michael Knapp (California Bar No. 314104)
Trial Attorney, Federal Programs Branch
U.S. Department of Justice, Civil Division
1100 L Street, NW, Room 11304
Washington, DC 20005
Tel.: (202) 305-8613
Email: Michael.Knapp@usdoj.gov

From: Lyons, Susan (HHS/OGC) [<mailto:Susan.Lyons@HHS.GOV>]

Sent: Tuesday, October 09, 2018 11:39 AM

To: Lin, Jean (CIV) <JLin@civ.usdoj.gov>

Cc: Brumer, Jonathan (HHS/OGC) <Jonathan.Brumer@HHS.GOV>; Keating, Gerard (HHS/OGC) <Gerard.Keating@HHS.GOV>; Knapp, Michael (CIV) <mknapp@CIV.USDOJ.GOV>

Subject: RE: Aliser v. SEIU California, No. 2:18-cv-02574-MCE-CKD

(b)(5)

From: Lin, Jean (CIV) <Jean.Lin@usdoj.gov>

Sent: Tuesday, October 9, 2018 11:36 AM

To: Lyons, Susan (HHS/OGC) <Susan.Lyons@HHS.GOV>

Cc: Brumer, Jonathan (HHS/OGC) <Jonathan.Brumer@HHS.GOV>; Keating, Gerard (HHS/OGC) <Gerard.Keating@HHS.GOV>; Knapp, Michael (CIV) <Michael.Knapp@usdoj.gov>

Subject: RE: Aliser v. SEIU California, No. 2:18-cv-02574-MCE-CKD

Susan:

(b)(5)

Michael:

(b)(5)

Jean Lin
Acting Deputy Director
U.S. Dep't of Justice, Civil Div.
Federal Programs Branch
jean.lin@usdoj.gov
(202) 514-3716

From: Lyons, Susan (HHS/OGC) [<mailto:Susan.Lyons@HHS.GOV>]

Sent: Wednesday, October 03, 2018 9:35 AM

To: Lin, Jean (CIV) <JLin@civ.usdoj.gov>

Cc: Brumer, Jonathan (HHS/OGC) <Jonathan.Brumer@HHS.GOV>; Keating, Gerard (HHS/OGC) <Gerard.Keating@HHS.GOV>

Subject: RE: Aliser v. SEIU California, No. 2:18-cv-02574-MCE-CKD

(b)(5)

From: Lin, Jean (CIV) <Jean.Lin@usdoj.gov>

Sent: Wednesday, October 3, 2018 9:30 AM

To: Lyons, Susan (HHS/OGC) <Susan.Lyons@HHS.GOV>

Cc: Brumer, Jonathan (HHS/OGC) <Jonathan.Brumer@HHS.GOV>; Keating, Gerard (HHS/OGC) <Gerard.Keating@HHS.GOV>

Subject: RE: Aliser v. SEIU California, No. 2:18-cv-02574-MCE-CKD

(b)(5)

From: Lyons, Susan (HHS/OGC) [<mailto:Susan.Lyons@HHS.GOV>]

Sent: Wednesday, October 03, 2018 8:43 AM

To: Lin, Jean (CIV) <JLin@civ.usdoj.gov>

Cc: Brumer, Jonathan (HHS/OGC) <Jonathan.Brumer@HHS.GOV>; Keating, Gerard (HHS/OGC) <Gerard.Keating@HHS.GOV>

Subject: RE: Aliser v. SEIU California, No. 2:18-cv-02574-MCE-CKD

(b)(5)

From: Lin, Jean (CIV) <Jean.Lin@usdoj.gov>

Sent: Tuesday, October 2, 2018 5:28 PM

To: Lyons, Susan (HHS/OGC) <Susan.Lyons@HHS.GOV>

Subject: RE: Aliser v. SEIU California, No. 2:18-cv-02574-MCE-CKD

(b)(5)

From: Lyons, Susan (HHS/OGC) [<mailto:Susan.Lyons@HHS.GOV>]

Sent: Tuesday, October 02, 2018 5:16 PM

To: Lin, Jean (CIV) <JLin@civ.usdoj.gov>

Subject: RE: Aliser v. SEIU California, No. 2:18-cv-02574-MCE-CKD

Hi Jean.

(b)(5)

Thanks.

From: Lin, Jean (CIV) <Jean.Lin@usdoj.gov>

Sent: Thursday, September 27, 2018 11:55 AM

To: Lyons, Susan (HHS/OGC) <Susan.Lyons@HHS.GOV>

Subject: RE: Aliser v. SEIU California, No. 2:18-cv-02574-MCE-CKD

(b)(5)

From: Lyons, Susan (HHS/OGC) [<mailto:Susan.Lyons@HHS.GOV>]

Sent: Wednesday, September 26, 2018 12:58 PM

To: Lin, Jean (CIV) <JLin@civ.usdoj.gov>

Subject: FW: Aliser v. SEIU California, No. 2:18-cv-02574-MCE-CKD

Jean,

(b)(5)

(b)(5)

Thanks!

Susan

(b)(5)

(b)(5)

From: Cleary, Kelly (HHS/OGC)
Sent: Wednesday, September 26, 2018 12:05 PM
To: Hoffman, Janice (HHS/OGC) <Janice.Hoffman@HHS.GOV>; Lyons, Susan (HHS/OGC) <Susan.Lyons@HHS.GOV>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Nolan, Janet (HHS/OGC) <Janet.Nolan@hhs.gov>
Subject: FW: Aliser v. SEIU California, No. 2:18-cv-02574-MCE-CKD

(b)(5)

From: Jonathan Mitchell <jonathan@mitchell.law>
Sent: Tuesday, September 25, 2018 4:43 PM
To: Cleary, Kelly (HHS/OGC) <Kelly.Cleary@hhs.gov>
Subject: Aliser v. SEIU California, No. 2:18-cv-02574-MCE-CKD

Jonathan F. Mitchell
Mitchell Law PLLC
106 East Sixth Street, Suite 900
Austin, Texas 78701
(512) 686-3940 (phone)
(512) 686-3941 (fax)
jonathan@mitchell.law

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Fan, Kristin A. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: (b)(5)
Date: Monday, November 5, 2018 2:19:00 PM

FYI

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

Mobile: (b)(6)

Fax: (410) 786-8533

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From: Brumer, Jonathan (HHS/OGC)
Sent: Monday, November 5, 2018 1:37 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>
Subject: (b)(5)

Chris,

(b)(5)

(b)(5)

Jon

From: Farrell, Caroline (HHS/OGC)

Sent: Friday, November 2, 2018 4:16 PM

To: Brumer, Jonathan (HHS/OGC) <Jonathan.Brumer@HHS.GOV>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Subject: (b)(5)

I agree – and I think CMS will be better to tell you than we are.

Caroline L. Farrell

Attorney

Office of the General Counsel, CMS Division

United States Department of Health and Human Services

(202) 708 - 9735

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From: Brumer, Jonathan (HHS/OGC)

Sent: Friday, November 2, 2018 4:13 PM

To: Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Subject: (b)(5)

Okay. Yes. It can't wait till Monday. Let's definitely address it during the call on Monday.

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Thursday, November 1, 2018 5:21 PM

To: Brumer, Jonathan (HHS/OGC) <Jonathan.Brumer@HHS.GOV>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>

Cc: Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Subject: (b)(5)

Hey Jonathan,

Would 4:00pm - 4:30pm work for you all?

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

Mobile: (b)(6)

Fax: (410) 786-8533

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From: Brumer, Jonathan (HHS/OGC)

Sent: Thursday, November 1, 2018 5:14 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>

Cc: Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Subject: RE: CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

Do you have any other availability that day? Say in the morning or after 2:00 pm?

-----Original Appointment-----

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Thursday, November 1, 2018 4:55 PM

To: Farrell, Caroline (HHS/OGC); Silanskis, Jeremy D. (CMS/CMCS); Mikow, Asher S. (CMS/CMCS)

Cc: Popp, Dawn (HHS/OGC); Brumer, Jonathan (HHS/OGC)

Subject: CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

When: Monday, November 5, 2018 12:30 PM-1:30 PM (UTC-05:00) Eastern Time (US & Canada).

Where: WebEx Online

Hey Caroline, Dawn, and Jonathan,

Please let me know if this time does not work for you all.

Thank you,

From: Farrell, Caroline (HHS/OGC)

Sent: Thursday, November 1, 2018 4:51 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Cc: Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Brumer, Jonathan (HHS/OGC) <Jonathan.Brumer@HHS.GOV>

Subject: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

Chris,

We met with DOJ today and it is looking like we will need to discuss the following questions with CMCS:



(b)(5)

Might it be possible to set up another appointment to meet about these questions?

Thank you,

Caroline L. Farrell

Attorney

Office of the General Counsel, CMS Division

United States Department of Health and Human Services

(202) 708 - 9735

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CHRISTOPHER THOMPSON has scheduled this WebEx meeting.

CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

Host: CHRISTOPHER THOMPSON

Access Information

1. Please call the following number:

WebEx: [REDACTED]

2. Follow the instructions you hear on the phone.

Your WebEx Meeting Number: [REDACTED]

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Enter Meeting Number: Use Meeting WebEx Number provided above.

=====

To join this meeting online

1. Go to [REDACTED] (b)(5)

[REDACTED] (b)(5)

2. If requested, enter your name and email address.
3. If a password is required, enter the meeting password: (This meeting does not require a password.)
4. Click "Join".

5. Follow the instructions that appear on your screen.

+++++

This meeting may be recorded by the host. If you have questions, please contact the host.

+++++

Hosts, need your host access code or key? Go to the meeting information page:

(b)(5)

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The meetings.cms.gov team

From: [Barco, Evell J. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#)
Subject: FW: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS 2413-P)—ADVANCE REGULATION
Date: Friday, April 6, 2018 12:03:05 PM

Chris,

Per our conversation.

From: Shelton, Carrie A (HHS/IOS)
Sent: Friday, April 6, 2018 9:12 AM
To: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Wilson, Lynette N. (CMS/OSORA) <Lynette.Wilson@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS 2413-P)—ADVANCE REGULATION

Good morning,

IOS blessed this for clearance. Please put this into SPS; I'll get it out today and comments will be due next Friday, April 13. Is there a briefing paper ready?

Thanks,
Carrie

From: Shelton, Carrie A (HHS/IOS)
Sent: Thursday, April 05, 2018 11:21 AM
To: Brewer, Annette M. (CMS/OSORA)
Cc: Jones, Martique S. (CMS/OSORA); Harris, Sheli E. (CMS/OSORA); Lafferty, Tiffany R. (CMS/OSORA); Hubbard, Lisa A. (CMS/OSORA); Barco, Evell J. (CMS/OSORA); Fultz-Mimms, Trenesha N. (CMS/OSORA); Wilson, Lynette N. (CMS/OSORA); Garcia, Vanessa (CMS/OSORA); Clybourn, Olen D. (CMS/OSORA); Miller, Ruth A. (CMS/OSORA); Phan, Thomas M. (CMS/OSORA); Brooks, Gaysha M. (CMS/OSORA); Lambert-Lawson, Cynthia (CMS/OSORA)
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS 2413-P)—ADVANCE REGULATION

Thanks, all. I'm awaiting feedback from the Dep Sec's office on whether I can initiate clearance without having the pre-development memo for them.

From: Brewer, Annette M. (CMS/OSORA)

Sent: Thursday, April 05, 2018 10:44 AM

To: Shelton, Carrie A (HHS/IOS)

Cc: Jones, Martique S. (CMS/OSORA); Harris, Sheli E. (CMS/OSORA); Lafferty, Tiffany R. (CMS/OSORA); Hubbard, Lisa A. (CMS/OSORA); Barco, Evell J. (CMS/OSORA); Fultz-Mimms, Trenesha N. (CMS/OSORA); Wilson, Lynette N. (CMS/OSORA); Garcia, Vanessa (CMS/OSORA); Clybourn, Olen D. (CMS/OSORA); Miller, Ruth A. (CMS/OSORA); Phan, Thomas M. (CMS/OSORA); Brooks, Gaysa M. (CMS/OSORA); Lambert-Lawson, Cynthia (CMS/OSORA)

Subject: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS 2413-P)—ADVANCE REGULATION

Importance: High

SUBJECT: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS2413-P)—ADVANCE REGULATION

(b)(5)

Thank you for your help in expediting the publication of this proposed rule.

Attachments:

--Master FR Document

<< File: CMS-2413-P_Master_(04-05-18).docx >>

From: [Boston, Beverly A. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Cc: [Fan, Kristin A. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#)
Subject: FW: Provider Reassignment Regulation
Date: Monday, October 22, 2018 1:55:03 PM

fyi

Beverly

From: Teal, Lela (CMS/CMCS)
Sent: Monday, October 22, 2018 1:42 PM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: Provider Reassignment Regulation

Calder has it on his pile for today.

From: Boston, Beverly A. (CMS/CMCS)
Sent: Monday, October 22, 2018 12:52 PM
To: Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>
Subject: FW: Provider Reassignment Regulation

Do you know where the OCD is with clearing the provider payment rule? Our deadline that Calder negotiated was Friday to OSORA, but we will need to get the greenlight from the OCD before moving the reg.

Thanks

Beverly

From: Fan, Kristin A. (CMS/CMCS)
Sent: Friday, October 19, 2018 2:15 PM
To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Mayhew, Mary (CMS/OA) <Mary.Mayhew@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>
Cc: Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: Provider Reassignment Regulation

Attached is a clean version of the final reg as well as an updated overview of comments received. Please let us know if there are any questions and if we can move it to OSORA early next week.

From: [Failla, George P. \(CMS/CMCS\)](#)
To: [Lollar, Ralph F. \(CMS/CMCS\)](#); [Sciulli, Margherita R. \(CMS/CMCS\)](#); [Kayala, Dianne E. \(CMS/CMCS\)](#)
Cc: [Poisal, Kathryn J. \(CMS/CMCS\)](#); [Harris, Melissa L. \(CMS/CMCS\)](#); [Blackfield, Anne \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: FW: Provider Reimbursement Reassignment NPRM and (b)(5)
Date: Monday, June 4, 2018 5:24:53 PM

Adding Marge, Dianne and Ralph

George

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, June 4, 2018 5:20 PM
To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>
Subject: Provider Reimbursement Reassignment NPRM and (b)(5)

Hello all,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: [CMS Coordination_Regs_OSORA](#)
To: [Zhang, Nancy N. \(CMS/OSORA\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#); [Brooks, Gaysha M. \(CMS/OSORA\)](#)
Cc: [Brewer, Annette M. \(CMS/OSORA\)](#)
Subject: FW: Request for reclearance of CMS-2413-F; Medicaid Program; Reassignment of Medicaid Provider Claims
Date: Friday, December 7, 2018 1:54:58 PM

From: Brandt, John (CMS/OL)
Sent: Friday, December 7, 2018 1:11 PM
To: CMS Coordination_Regs_OSORA <Coordination_Regs_OSORA@cms.hhs.gov>
Cc: CMS OLClearances <OLClearances@cms.hhs.gov>; Stahlman, Mary Ellen (CMS/OL) <MaryEllen.Stahlman@cms.hhs.gov>; Upchurch, Talaiya (CMS/OL) <Talaiya.Upchurch@cms.hhs.gov>; Linnane, Keara M. (CMS/OL) <Keara.Linnane@cms.hhs.gov>
Subject: RE: Request for reclearance of CMS-2413-F; Medicaid Program; Reassignment of Medicaid Provider Claims

OL concurs without comments. Thanks!

Best,
-JP

From: CMS Coordination_Regs_OSORA
Sent: Thursday, December 6, 2018 1:26 PM
To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; CMS OLClearances <OLClearances@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Brandt, John (CMS/OL) <John.Brandt@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Subject: Request for reclearance of CMS-2413-F; Medicaid Program; Reassignment of Medicaid Provider Claims

Re-Clearance requested by Thursday, December 13, 2018.

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(b)(5)

From: [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
To: [Fan, Kristin A. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#)
Cc: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Badaracco, Andrew \(CMS/CMCS\)](#)
Subject: FW: TIME SENSITIVE -- RE: NH SPA 18-0006, Status Update
Date: Wednesday, June 20, 2018 2:58:51 PM
Importance: High

New Hampshire is asking to sunset the NF Proshare payments to give time to change the IGT process on or before June 30, 2019. I think that is the only major hold-up on the SPA and they want to respond to the RAI tomorrow and get moving toward approval. Do we need to take the sunset back up to Tim before we move forward? Thanks.

From: James-Hailey, Novena M. (CMS/CMCHO)
Sent: Tuesday, June 19, 2018 4:37 PM
To: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Weaver, Robert K. (CMS/CMCS) <Robert.Weaver@cms.hhs.gov>; Badaracco, Andrew (CMS/CMCS) <Andrew.Badaracco@cms.hhs.gov>; Thomas, Douglas A. (CMS/CMCS) <Douglas.Thomas@cms.hhs.gov>; Weidler, Timothy A. (CMS/CMCHO) <Timothy.Weidler@cms.hhs.gov>; Parris, Robert J. (CMS/CMCHO) <Robert.Parris@cms.hhs.gov>; Wong, Mark I. (CMS/CMCHO) <Mark.Wong@cms.hhs.gov>
Subject: FW: TIME SENSITIVE -- RE: NH SPA 18-0006, Status Update
Importance: High

Good Afternoon Jeremy,

Please see NH's email below pertaining to a sunset date and the attached response to the informal RAI. Please note the 90th day on the 1st clock is 6/24/2018. Also, attached is the RAI which was signed off by the Rich McGreal earlier today. Just want you to know that Rich wants the RAI out by COB today to allow us enough time to thoroughly review the entire response from the state.

Thanks,
Novena

From: Scheetz, Deborah [<mailto:Deborah.Scheetz@dhhs.nh.gov>]
Sent: Tuesday, June 19, 2018 2:33 PM
To: Badaracco, Andrew (CMS/CMCS) <Andrew.Badaracco@cms.hhs.gov>; James-Hailey, Novena M. (CMS/CMCHO) <novena.jameshailey@cms.hhs.gov>
Cc: Butterworth, Joyce (CMS/CMCHO) <Joyce.Butterworth@cms.hhs.gov>; McGreal, Richard R. (CMS/CMCHO) <richard.mcgreal@cms.hhs.gov>; Lipman, Henry <Henry.Lipman@dhhs.nh.gov>; Peterson, Diane <Diane.Peterson@dhhs.nh.gov>; Landry, Dawn <Dawn.Landry@dhhs.nh.gov>
Subject: TIME SENSITIVE -- RE: NH SPA 18-0006, Status Update
Importance: High

Andrew and Novena, Thank you for your continued assistance with a timely administrative approval for NH SPA 18-00006. Diane Peterson has submitted officially through the SPA mailbox the updated pages, SFQs, etc. with a cc to both of you and Joyce. Henry Lipman has asked that I confirm the following:

- Proshare 1 –The State agrees to a sunset date on or before June 30, 2019.
- Proshare 2 – The State agrees that only the federal share of the total computable will be drawn down on the state expenditures for the certified public expenditure and as such, those federal funds cannot be used to draw down additional federal funds under the waiver.
- MQIP -- The state agrees that the MQIP payment pool will be updated on a quarterly basis through the submission of a state plan amendment.

Please know that we are keenly aware of the 90th day hitting this Sunday, June 24, so please reach out directly to Diane or I with any follow on as early as possible.

Respectfully, Deb Scheetz

Deb Scheetz
Deputy Medicaid Director
Department of Health & Human Services
129 Pleasant Street
Concord, NH 03301
603-271-9459
Deborah.Scheetz@dhhs.nh.gov

From: Badaracco, Andrew (CMS/CMCS) [<mailto:Andrew.Badaracco@cms.hhs.gov>]
Sent: Tuesday, June 12, 2018 11:19 AM
To: Gagnon, Athena; Lipman, Henry; Scheetz, Deborah; Capuchino, Kelley; Ferwerda, Christine; Peterson, Diane
Cc: Goldman, Adam J. (CMS/CMCS); Driscoll, Sandra (CMS/CMCHO); Butterworth, Joyce (CMS/CMCHO); Mills, Stephen C. (CMS/CMCHO); James-Hailey, Novena M. (CMS/CMCHO); Douglas, Arthur H. (CMS/CMCHO); Parris, Robert J. (CMS/CMCHO); McGreal, Richard R. (CMS/CMCHO); Boozang, Patricia; Karl, Anne O.; Fan, Kristin A. (CMS/CMCS); Freeze, Janet G. (CMS/CMCS); Silanskis, Jeremy D. (CMS/CMCS); Thompson, Christopher C. (CMS/CMCS); Thomas, Douglas A. (CMS/CMCS)
Subject: NH SPA 18-0006, Status Update

Good morning, everyone,

We are approaching the 90th day on the first clock of SPA 18-0006, which includes Proshare 1 (IGT), Proshare 2 (CPE Methodology), and MQIP (provider tax), and I thought it might be helpful to outline where we stand with the SPA and the overall funding mechanisms for each. The 90th day is 6/24/2018, so CMS would need to make an administrative decision to either approve or issue an RAI prior to that date.

Proshare 1 – The methodology under the proposed state plan amendment reimburse providers up to the established Medicare RUG amount for the services provided. The underlying methodology in the plan is acceptable. Our understanding of the financing of these particular payments is that they are financed by state loans to the county governments, which are then repaid by the county after the FFP is drawn on the Medicaid payments. After our discussion between state and CMS leadership

and considering that the state must work with the legislators to find new funding sources for these payments, it appears that CMS is willing to allow a sunset of the methodology in the plan to provide some opportunity to continue claiming Proshare 1 for a defined period, but would require a new plan amendment once the new funding source is identified to continue making Proshare 1 payments under the state plan. To do this, CMS requests that the state provide some estimated timelines to confirm how long it might take to identify new sources of state share for these payment. Our understanding, based on prior conversations, is that arranging such financing would take approximately one year. As such, we would propose a sunset date that would authorize the methodology for another year after which time, the state would need to submit a SPA to re-authorize the methodology.

Please note, however, that total computable Medicaid payment amounts are due to the providers of the Medicaid services and requiring either mandatory or voluntary contributions back to the state would be in violation of Section 1902(a)(2) of the Social Security Act and 42 CFR 447.10, such contributions could also be considered non-bona fide provider-related donations under Section 1903(w)(6)(A) of the Social Security Act and 42 CFR 433.54. Such funds contributed back to the state could not be used to draw down additional FFP as those funds have already been matched by the federal government (42 CFR 433.51).

Proshare 2 - The CPE methodology proposed in SPA 18-0006 is considered acceptable. The state has provided cost reports and documentation to show the CPE represents actual allowable provider costs associated with the provision of allowable Medicaid services. FMG understands that the inclusion of the CPE was done at the direction of the 1115 waiver to replace claiming authority for a “Designated State Health Program” or DSHP under the standard terms and conditions (STCs) of the waiver. As we have discussed in detail, only the federal share of the total computable will be drawn down on the state expenditures for the certified public expenditure. As such, those federal funds cannot be used to draw down additional federal funds under the waiver.

MQIP – The methodology for MQIP described in the state plan is very close to being acceptable. We passed a final set of comments back to the state on 6/11/18, and once those changes are made the language will be considered acceptable. The state has indicated that the MQIP payment pool will be updated on a quarterly basis through the submission of a state plan amendment.

The above points represent our current position on each of the three parts of SPA 18-0006, and provide summaries of our policy related to the use of the FFP once it’s drawn down under the state plan. If the state can confirm agreement or concurrence on each of the above, we can continue to move toward a timely administrative decision on SPA 18-0006.

We look forward to working with you through the remainder of this process.

Thanks,
Andrew Badaracco

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Lyles, Tia \(CMS/CMCS\)](#); [Ihrig, Jocelyn B. \(CMS/CMCS\)](#); [Sabir, Jeremiah A. \(CMS/CMCS\)](#); [Johns, Hamilton J. \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#); [Brown, Sharon J. \(CMS/CMCS\)](#); [CMS - 5010](#)
Subject: HOLD: PRR - Analysis of Themes

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CHRISTOPHER THOMPSON has scheduled this WebEx meeting.

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Host: CHRISTOPHER THOMPSON

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From: [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Cc: [Brewer, Annette M. \(CMS/OSORA\)](#); [Lafferty, Tiffany R. \(CMS/OSORA\)](#); [Hubbard, Lisa A. \(CMS/OSORA\)](#)
Subject: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Date: Wednesday, November 21, 2018 7:28:42 AM

Good Morning Chris,

To update management, what is the ETA in receiving the revised draft for CMS-2413-F ?

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, November 19, 2018 12:42 PM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Gaysha,

Thank you and yes were on still on schedule with regard to 11/21 submission date.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Brooks, Gaysha M. (CMS/OSORA)

Sent: Monday, November 19, 2018 11:45 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

(b)(5)

Are you still on schedule to send the revisions on 11/21.

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, November 19, 2018 11:40 AM

To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Gaysha,

(b)(5)

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

Mobile: (b)(6)

Fax: (410) 786-8533

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From: Brooks, Gaysha M. (CMS/OSORA)

Sent: Tuesday, November 13, 2018 10:11 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>

Cc: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning,

Please provide us with an update on when the revised draft will be sent.

Thanks

From: Brooks, Gaysha M. (CMS/OSORA)

Sent: Friday, November 9, 2018 11:44 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>

Cc: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Chris,

Now that CMS clearance is complete, please let us know when the revised draft will be sent.

Thanks

From: Farrell, Caroline (HHS/OGC)

Sent: Friday, November 9, 2018 11:17 AM

To: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good morning,

Please see attached for OGC's comment on the draft Medicaid Provider Payment Reassignment NPRM.

Please let us know if you have questions and whether you would like to have a call to discuss our comments.

Thank you,

Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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From: Brewer, Annette M. (CMS/OSORA)

Sent: Tuesday, November 6, 2018 11:18 AM

To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program;

Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

Hi Caroline,

Any updates on when we can expect OGC comments? With the rule scheduled for publication this month, we really need to revise the rule based on CMS comments and move to HHS asap. Any help would be appreciated.

Thanks,

Annette M. Brewer 

 410-786-6580

(b)(6)

ADS on Mondays

From: Farrell, Caroline (HHS/OGC)

Sent: Friday, November 2, 2018 3:26 PM

To: CMS Coordination_Regs_OSORA <Coordination_Regs_OSORA@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

OGC is still working on this review and should be able to provide comments next week. Please check in early next week if you want a more specific update.

Caroline L. Farrell

Attorney

Office of the General Counsel, CMS Division

United States Department of Health and Human Services

(202) 708 - 9735

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From: CMS Coordination_Regs_OSORA

Sent: Friday, November 2, 2018 2:35 PM

To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS)

<Kristin.Fan@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: FW: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

Note to OGC: Clearance for CMS-2413-F was due on Tuesday, October 30, 2018. We are still pending clearance/comments from OGC. Please provide us with an update as soon as possible.

Thanks

From: CMS Coordination_Regs_OSORA

Sent: Wednesday, October 31, 2018 9:53 AM

To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; CMS OLClearances <OLClearances@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

Good Morning,

This is a friendly reminder that the clearance for CMS-2413-F are now overdue. Clearances were due October 30, 2018. Thank you.

From: CMS Coordination_Regs_OSORA

Sent: Tuesday, October 23, 2018 5:06 PM

To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; CMS OLClearances <OLClearances@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan,

Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

CMS-2413-F: Medicaid Program; Reassignment of Medicaid Provider Claims

Clearance is requested by 5 p.m., Tuesday, October 30, 2018.

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(b)(5)

If you have any questions regarding submission of clearances and comments, you may contact Cynthia Lambert-Lawson (x6-1366). Please call **Chris Thompson (X6-4044) for policy related questions.**

This final rule is scheduled for publication on November 30, 2018. Therefore, it is important that we receive all clearances timely. Thank you, in advance, for your prompt response.

From: [Microsoft Outlook](#) on behalf of [Brumer, Jonathan \(HHS/OGC\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Meeting Forward Notification: CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

Your meeting was forwarded

Brumer, Jonathan (HHS/OGC) <<mailto:Jonathan.Brumer@HHS.GOV>> has forwarded your meeting request to additional recipients.

Meeting
CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

Meeting Time
Monday, 05 November 2018 16:00-16:30.

Recipients
Keating, Gerard (HHS/OGC) <<mailto:Gerard.Keating@HHS.GOV>>

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

Sent by Microsoft Exchange Server

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Farrell, Caroline \(HHS/OGC\)](#)
Subject: Phone conversation tomorrow (b)(5)

From: Farrell, Caroline (HHS/OGC)
Sent: Monday, June 4, 2018 3:35 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> >
Subject: Re: Phone conversation tomorrow (b)(5)

Let's do 9:45. Do you want to send an appointment?

On: 04 June 2018 15:25,
"Thompson, Christopher C. (CMS/CMCS)" <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> > wrote:
Hi Caroline,

Yes, I am free right before the OMB call. Would 9:30 or 9:45 work?

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW: This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

From: Farrell, Caroline (HHS/OGC)
Sent: Monday, June 4, 2018 3:23 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> >
Subject: Phone conversation tomorrow re. (b)(5)

Might you be free right before or after the OMB call to talk about (b)(5)

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Farrell, Caroline \(HHS/OGC\)](#)
Subject: Phone conversation tomorrow re. (b)(5)

From: Farrell, Caroline (HHS/OGC)
Sent: Monday, June 4, 2018 3:35 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> >
Subject: Re: Phone conversation tomorrow re. (b)(5)

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"Thompson, Christopher C. (CMS/CMCS)" <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> > wrote:
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Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
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From: Farrell, Caroline (HHS/OGC)
Sent: Monday, June 4, 2018 3:23 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> >
Subject: Phone conversation tomorrow re. (b)(5)

Might you be free right before or after the OMB call to talk about (b)(5)

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)

To: [Farrell, Caroline \(HHS/OGC\)](#)

Subject: Phone conversation tomorrow re. (b)(5)

From: Farrell, Caroline (HHS/OGC)

Sent: Monday, June 4, 2018 3:35 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> >

Subject: Re: Phone conversation tomorrow re. (b)(5)

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Hi Caroline,

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Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
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Phone: (410)786-4044
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From: Farrell, Caroline (HHS/OGC)

Sent: Monday, June 4, 2018 3:23 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> >

Subject: Phone conversation tomorrow re. (b)(5)

Might you be free right before or after the OMB call to talk about (b)(5)

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To: [Farrell, Caroline \(HHS/OGC\)](#)
Subject: Phone conversation tomorrow re. (b)(5)

From: Farrell, Caroline (HHS/OGC)
Sent: Monday, June 4, 2018 3:35 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> >
Subject: Re: Phone conversation tomorrow re. (b)(5)

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"Thompson, Christopher C. (CMS/CMCS)" <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> > wrote:
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Yes, I am free right before the OMB call. Would 9:30 or 9:45 work?

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
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Phone: (410)786-4044
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From: Farrell, Caroline (HHS/OGC)
Sent: Monday, June 4, 2018 3:23 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> >
Subject: Phone conversation tomorrow re. (b)(5)

Might you be free right before or after the OMB call to talk about (b)(5)

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Farrell, Caroline \(HHS/OGC\)](#)
Subject: Provider Payment Reassignment (CMS-2413-P)

I am not sure of whether webex is down at the moment. Can you dial me directly at (410)786-4044.

Thank you,

From: Farrell, Caroline (HHS/OGC)
Sent: Thursday, May 31, 2018 4:22 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> >
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov <mailto:Kristin.Fan@cms.hhs.gov> >; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov <mailto:Janet.Freeze@cms.hhs.gov> >; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov <mailto:Jeremy.Silanskis@cms.hhs.gov> >; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov <mailto:Beverly.Boston@cms.hhs.gov> >
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Chris,

Sorry for the delay in getting back to you. I am still digging through emails after being out for the long weekend.

It might be most efficient if we got on the phone to discuss your email. Might you be free tomorrow morning? I can talk from 10-1030 or 11-1130, but am otherwise almost all booked up tomorrow.

Thank you,
Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

Notice: The contents of this message and any attachments may be privileged and confidential. Please do not disseminate without the approval of the Office of the General Counsel. If you are not an intended recipient, or have received this message in error, please delete it without reading it and please do not print, copy, forward, disseminate, or otherwise use the information. Also, please notify the sender that you have received this communication in error. Your receipt of this message is not intended to waive any applicable privilege

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, May 30, 2018 2:19 PM
To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov <mailto:Caroline.Farrell@hhs.gov> >
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov <mailto:Kristin.Fan@cms.hhs.gov> >; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov <mailto:Janet.Freeze@cms.hhs.gov> >; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov <mailto:Jeremy.Silanskis@cms.hhs.gov> >; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov <mailto:Beverly.Boston@cms.hhs.gov> >
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hi Caroline,

(b)(5)

Thank you,

Chris Thompson

Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: Fultz-Mimms, Trenesha N. (CMS/OSORA)
Sent: Tuesday, May 29, 2018 9:30 AM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov <mailto:Gaysha.Brooks@cms.hhs.gov>>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov>>; Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov <mailto:Evell.Barco@cms.hhs.gov>>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov <mailto:Mitch.Bryman@cms.hhs.gov>>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov <mailto:Eric.Laib2@cms.hhs.gov>>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov <mailto:Cynthia.Lambert-Lawson@cms.hhs.gov>>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov <mailto:Annette.Brewer@cms.hhs.gov>>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov <mailto:Beverly.Boston@cms.hhs.gov>>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov <mailto:Jeremy.Silanskis@cms.hhs.gov>>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov <mailto:Janet.Freeze@cms.hhs.gov>>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov <mailto:Kristin.Fan@cms.hhs.gov>>
Cc: Wilson, Lynette N. (CMS/OSORA) <Lynette.Wilson@cms.hhs.gov <mailto:Lynette.Wilson@cms.hhs.gov>>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov <mailto:Vanessa.Garcia@cms.hhs.gov>>; Cavanaugh, Alicia A. (CMS/OSORA) <Alicia.Cavanaugh@cms.hhs.gov <mailto:Alicia.Cavanaugh@cms.hhs.gov>>; Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov <mailto:Olen.Clybourn@cms.hhs.gov>>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov <mailto:Sheli.Harris@cms.hhs.gov>>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov <mailto:Lisa.Hubbard@cms.hhs.gov>>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov <mailto:Martique.Jones@cms.hhs.gov>>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov <mailto:Tiffany.Lafferty@cms.hhs.gov>>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov <mailto:Ruth.Miller@cms.hhs.gov>>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov <mailto:Thomas.Phan@cms.hhs.gov>>; Richmond, Carly M. (CMS/OSORA) <carly.richmond@cms.hhs.gov <mailto:carly.richmond@cms.hhs.gov>>; Wickliffe, Jim (CMS/OSORA) <Jim.Wickliffe@cms.hhs.gov <mailto:Jim.Wickliffe@cms.hhs.gov>>
Subject: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hello All-
As of today, HHS clearance is complete.

Comments: OGC (attached)

Thanks,
Trenesha

From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Tuesday, May 15, 2018 2:35 PM
To: Shelton, Carrie A (HHS/IOS) <Carrie.Shelton@HHS.GOV <mailto:Carrie.Shelton@HHS.GOV>>; Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov <mailto:Evell.Barco@cms.hhs.gov>>
Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov <mailto:Martique.Jones@cms.hhs.gov>>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov <mailto:Sheli.Harris@cms.hhs.gov>>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov <mailto:Tiffany.Lafferty@cms.hhs.gov>>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov <mailto:Lisa.Hubbard@cms.hhs.gov>>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov <mailto:Cynthia.Lambert-Lawson@cms.hhs.gov>>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov <mailto:Annette.Brewer@cms.hhs.gov>>; Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov <mailto:Olen.Clybourn@cms.hhs.gov>>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov <mailto:Ruth.Miller@cms.hhs.gov>>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov <mailto:trenesha.fultzmimms@cms.hhs.gov>>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov <mailto:Vanessa.Garcia@cms.hhs.gov>>; Wilson, Lynette N. (CMS/OSORA) <Lynette.Wilson@cms.hhs.gov <mailto:Lynette.Wilson@cms.hhs.gov>>
Subject: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS 2413-P)— CLEARANCE REQUEST

Action Requested: We have attached a redline-strikeout markup and a revised document for HHS and OMB clearance. We wish to display this rule by June 22, 2018. We are requesting HHS and OMB comments by Friday, May 25th. This is pre-decisional information and distribution should be limited to only those staff who must review and clear it.

Summary of Changes: We received comments from ACL, ASL, ASPE, OGC, and the May 3rd OMB passback. We have addressed the comments and have incorporated them in the revised document, as indicated in the attached redline-strikeout markup. Comments requiring responses are outlined in the attached document.

Thank you for your help in expediting the publication of this proposed rule.

Attachments:
--Master FR Document
--Redline/Strikeout Markup
--Responses to Comments that Required Further Explanation or Did Not Require Changes to the Rule

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Farrell, Caroline \(HHS/OGC\)](#); [Popp, Dawn \(HHS/OGC\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Cc: [Mikow, Asher S. \(CMS/CMCS\)](#)
Subject: Provider Reassignment Final Rule - Legal Comments

From: Farrell, Caroline (HHS/OGC)
Sent: Friday, October 19, 2018 12:19 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> >; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov <mailto:Dawn.Popp@hhs.gov> >
Cc: Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov <mailto:Asher.Mikow@cms.hhs.gov> >
Subject: Re: Provider Reassignment Final Rule - Legal Comments

Can we talk about this early next week?

On: 19 October 2018 11:18,
"Thompson, Christopher C. (CMS/CMCS)" <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> > wrote:
Hey Dawn and Caroline,

I wanted to circle back to you all on the legal comments below. Of particular interest is the comment and the proposed response below:

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, October 17, 2018 11:51 AM
To: Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov <mailto:Dawn.Popp@hhs.gov> >; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov <mailto:Caroline.Farrell@hhs.gov> >
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov <mailto:Jeremy.Silanskis@cms.hhs.gov> >; Lyles, Tia (CMS/CMCS) <tia.lyles@cms.hhs.gov <mailto:tia.lyles@cms.hhs.gov> >; Sabir, Jeremiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov <mailto:Jerimiah.Sabir@cms.hhs.gov> >; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov <mailto:Hamilton.Johns@cms.hhs.gov> >; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov <mailto:Asher.Mikow@cms.hhs.gov> >; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov <mailto:Sharon.Brown@cms.hhs.gov> >
Subject: Provider Reassignment Final Rule - Legal Comments

Hi Dawn and Caroline,

We have a couple comments and proposed responses we wanted to run by you all. I know you all will get a chance to review these comments and responses within the clearance process, but we want to try to iron these issues out before we put the final rule back into clearance this Friday:

(b)(5)

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
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DO NOT DELETE OR CHANGE ANY OF THE TEXT BELOW THIS LINE

CHRISTOPHER THOMPSON has scheduled this WebEx meeting.

Provider Reassignment Final Rule - Legal Comments
Host: CHRISTOPHER THOMPSON

Access Information

1. Please call the following number:
WebEx: (b)(5)
2. Follow the instructions you hear on the phone.

Your WebEx Meeting Number (b)(5)

=====

To join from a Cisco VoIP enabled CMS Region or from CMS Central Office

1. Dial ext. (b)(5)
Enter Meeting Number: Use Meeting WebEx Number provided above.

=====

To join this meeting online

1. Go to (b)(5)
2. If requested, enter your name and email address.
3. If a password is required, enter the meeting password: (This meeting does not require a password.)
4. Click "Join".
5. Follow the instructions that appear on your screen.

+++++
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+++++

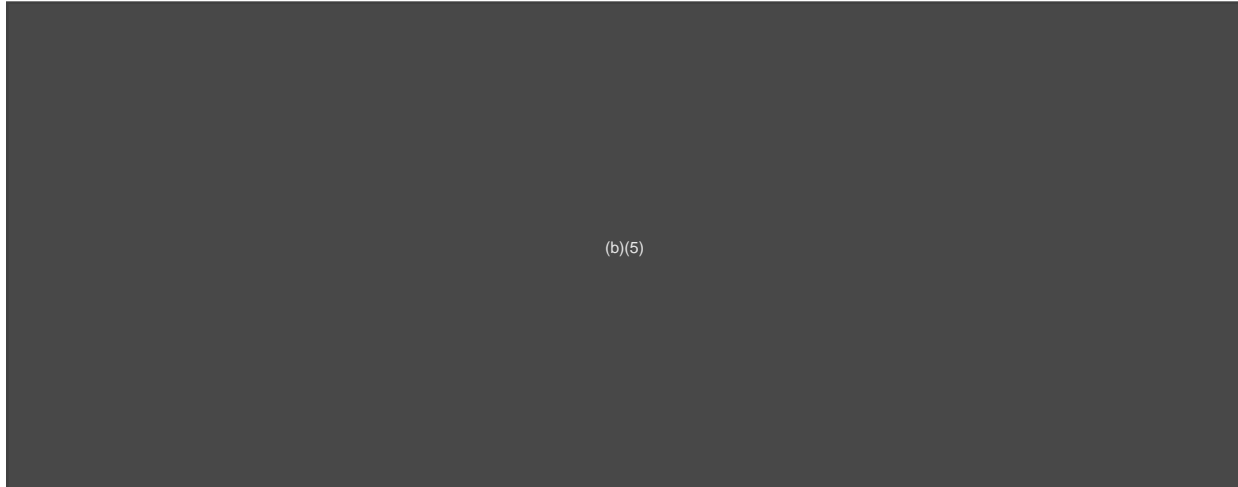
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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Harris, Melissa L. \(CMS/CMCS\)](#); [Poisal, Kathryn J. \(CMS/CMCS\)](#); [Failla, George P. \(CMS/CMCS\)](#)
Subject: Provider Reimbursement Reassignment NPRM [REDACTED]
Date: Monday, June 4, 2018 5:20:00 PM

Hello all,



Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: [REDACTED]
Fax: (410) 786-8533

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Popp, Dawn \(HHS/OGC\)](#); [Farrell, Caroline \(HHS/OGC\)](#); [Harris, Melissa L. \(CMS/CMCS\)](#); [Cantwell, Kenya J. \(CMS/CMCS\)](#); [Lollar, Ralph F. \(CMS/CMCS\)](#); [Brown, Sharon J. \(CMS/CMCS\)](#); [Ihrig, Jocelyn B. \(CMS/CMCS\)](#); [Johns, Hamilton J. \(CMS/CMCS\)](#); [Lyles, Tia \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#); [Sabir, Jeremiah A. \(CMS/CMCS\)](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: PRR - OGC Edits- FMS

To discuss language to draw a distinction between the arrangements under FMS and reassignment for 1905(a) services.
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CHRISTOPHER THOMPSON has scheduled this WebEx meeting.

PRR - OGC Edits- FMS
Host: CHRISTOPHER THOMPSON

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Subject: PRR Comment Analysis - 8/3/16 CIB - references to 42 CFR 447.10(g)(4)

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Subject: RE: PRR Comment Analysis - 8/3/16 CIB - references to 42 CFR 447.10(g)(4)

Hi Chris, thanks for flagging this. That CIB wasn't on our radar screen (or at least it wasn't on mine). Is FMG planning to oversee the CIB revision?

Melissa Harris
Senior Policy Advisor
Disabled and Elderly Health Programs Group
Center for Medicaid and CHIP Services
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Mail Stop S2-14-26
Baltimore, MD 21244
(p) 410-786-3397
melissa.harris@cms.hhs.gov <mailto:melissa.harris@cms.hhs.gov>
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Subject: RE: PRR Comment Analysis - 8/3/16 CIB - references to 42 CFR 447.10(g)(4)

Hey DEH,

I wanted to give you guys a heads up on this comment and our proposed response. Attached is the document in question:

(b)(5)

Thank you,

<< File: 080316 HCBS CIB (3).pdf >>

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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Subject: RE: PRR Comment Analysis - NASUAD Comment and Response

How about this?

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Subject: PRR Comment Analysis - NASUAD Comment and Response

Please see the revised draft comment and response below:

(b)(5)

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
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From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, October 10, 2018 10:56 AM
To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov <mailto:Melissa.Harris@cms.hhs.gov>>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov <mailto:Jeremy.Silanskis@cms.hhs.gov>>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov <mailto:Kenya.Cantwell@cms.hhs.gov>>
Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov <mailto:Sharon.Brown@cms.hhs.gov>>
Subject: RE: Provider Reassignment paper for OGD review

Hey Melissa and Kenya,

(b)(5)

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
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Host: CHRISTOPHER THOMPSON

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Hey DEH,

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Thank you,

<< File: 080316 HCBS CIB (3).pdf >>

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Division of Reimbursement & State Financing
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Centers for Medicare & Medicaid Services

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Subject: PRR Comment Analysis - NASUAD Comment and Response

Please see the revised draft comment and response below:

(b)(5)

Chris Thompson
Deputy Division Director
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Subject: RE: Provider Reassignment paper for OGD review

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Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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CHRISTOPHER THOMPSON has scheduled this WebEx meeting.

PRR Comment Analysis - 8/3/16 CIB - references to 42 CFR 447.10(g)(4)
Host: CHRISTOPHER THOMPSON

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The meetings.cms.gov team

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Brown, Sharon J. \(CMS/CMCS\)](#); [Sabir, Jeremiah A. \(CMS/CMCS\)](#); [Johns, Hamilton J. \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#); [Lyles, Tia \(CMS/CMCS\)](#); [Ihrig, Jocelyn B. \(CMS/CMCS\)](#); [CMS S and C Training](#)
Subject: PRR Comment and Responses

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PRR Comment and Responses
Host: CHRISTOPHER THOMPSON

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Subject: PRR Comment and Responses

To review and agree on draft responses.

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PRR Comment and Responses

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Subject: PRR Comments and Responses

Assignments for Responses

Please flesh out the Comments and the Response for the following topics:

- 1) Loss of Benefit: Tia
 - 2) General Harm: Jocelyn
 - 3) Admin Burden: Hamilton
 - 4) Reduce State Flexibility: Asher
 - 5) Self-Direction - Tia
 - 6) 30 day Comment Period/Economic Analysis - Hamilton
 - 7) Factoring: Asher
 - 8) Unions: Jocelyn
 - 9) Other - to be addressed: Chris
 - 10) Technical - Chris
 - 11) Benefits not considered reassignment - Sharon
 - 12) Rights - Jocelyn
 - 13) Financial Impact to Providers: Jerimiah
 - 14) Negative Financial Impact to States
 - 15) Significant Impact: Hamilton
- Out of Scope – Questions Tab : Chris

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Subject: PRR Comments and Responses

Assignments for Responses

Please flesh out the Comments and the Response for the following topics:

- 1) Loss of Benefit: Tia
 - 2) General Harm: Jocelyn
 - 3) Admin Burden: Hamilton
 - 4) Reduce State Flexibility: Asher
 - 5) Self-Direction - Tia
 - 6) 30 day Comment Period/Economic Analysis - Hamilton
 - 7) Factoring: Asher
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 - 10) Technical - Chris
 - 11) Benefits not considered reassignment - Sharon
 - 12) Rights - Jocelyn
 - 13) Financial Impact to Providers: Jeremiah
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Subject: PRR Comments and Responses

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Thursday, October 4, 2018 4:29 PM
To: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov <mailto:Sharon.Brown@cms.hhs.gov> >; Lyles, Tia (CMS/CMCS) <tia.lyles@cms.hhs.gov <mailto:tia.lyles@cms.hhs.gov> >; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov <mailto:Jeremiah.Sabir@cms.hhs.gov> >; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov <mailto:Hamilton.Johns@cms.hhs.gov> >; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov <mailto:Asher.Mikow@cms.hhs.gov> >; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov <mailto:Jocelyn.Ihrig@cms.hhs.gov> >
Subject: PRR Comments and Responses

This

(b)(5)

Chris Thompson
Deputy Division Director
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PRR Comments and Responses
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Subject: PRR Comments and Responses
Date: Thursday, October 4, 2018 4:29:00 PM

[This](#) is a very rough draft of the comments and responses.

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
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Subject: PRR Final Rule - DEHPG Clearance

Hi Ralph, Melissa, and Kenya,

We would like to walk through our responses to your comments on the PRR Final Rule.
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PRR Final Rule - DEHPG Clearance
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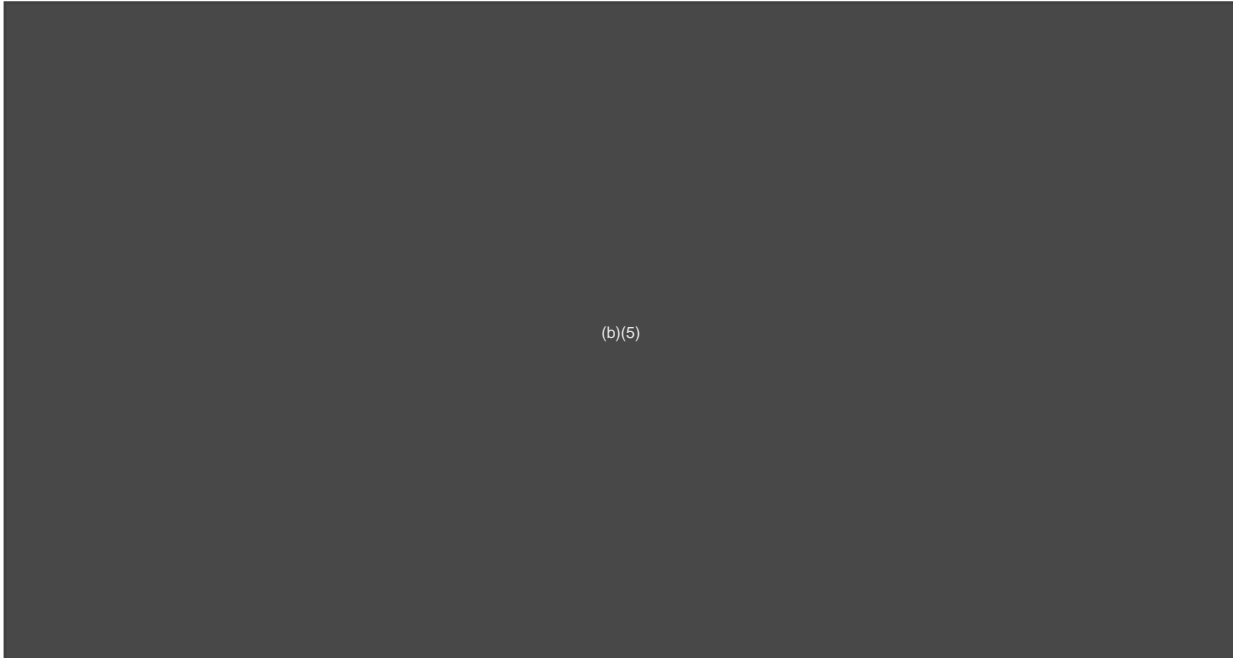
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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Popp, Dawn \(HHS/OGC\)](#); [Farrell, Caroline \(HHS/OGC\)](#); [Brown, Sharon J. \(CMS/CMCS\)](#); [Ihrig, Jocelyn B. \(CMS/CMCS\)](#); [Johns, Hamilton J. \(CMS/CMCS\)](#); [Lyles, Tia \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#); [Sabir, Jeremiah A. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Cc: [Boston, Beverly A. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#)
Subject: PRR OGC comments 42 CFRF (b)(5)
Date: Tuesday, November 27, 2018 4:38:00 PM

Hi Caroline and Dawn,



Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
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Subject: PRR OGC Comments

Melissa and Kenya,

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PRR OGC Comments
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Subject: PRR OGC Edits

From: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
To: [CMS C4-20-02](#); [Sabir, Jeremiah A. \(CMS/CMCS\)](#); [Johns, Hamilton J. \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#); [Lyles, Tia \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#)
Subject: PRR Room

Got us a room for 2 hours this morning. At 11am we will have to relocate.

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Lyles, Tia \(CMS/CMCS\)](#); [Sabir, Jeremiah A. \(CMS/CMCS\)](#); [Johns, Hamilton J. \(CMS/CMCS\)](#); [Ihrig, Jocelyn B. \(CMS/CMCS\)](#); [Brown, Sharon J. \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#)
Subject: PRR Themes

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CHRISTOPHER THOMPSON has scheduled this WebEx meeting.

PRR Themes
Host: CHRISTOPHER THOMPSON

Access Information

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2. Follow the instructions you hear on the phone.

Your WebEx Meeting Number: (b)(5)

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2. If requested, enter your name and email address.
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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#); [Brown, Sharon J. \(CMS/CMCS\)](#)
Subject: PRR

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PRR

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To: [Lyles, Tia \(CMS/CMCS\)](#); [Ihrig, Jocelyn B. \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#); [Johns, Hamilton J. \(CMS/CMCS\)](#); [Brown, Sharon J. \(CMS/CMCS\)](#); [Sabir, Jeremiah A. \(CMS/CMCS\)](#); [Stahlecker, Avery \(CMS/CMCS\)](#); [Motley, Danielle O. \(CMS/CMCS\)](#); [CMS N1-09-16](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: PRR: OGC Comments

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Friday, November 9, 2018 12:05 PM
To: Lyles, Tia (CMS/CMCS) <tia.lyles@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: FW: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

FYI..... clearance comments from OGC. I will set up an appointment for us to discuss!

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410) 786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Farrell, Caroline (HHS/OGC)
Sent: Friday, November 9, 2018 11:17 AM
To: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>
Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good morning,

Please see attached for OGC's comment on the draft Medicaid Provider Payment Reassignment NPRM.

Please let us know if you have questions and whether you would like to have a call to discuss our comments.

Thank you,

Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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Sent: Tuesday, November 6, 2018 11:18 AM
To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>

<mailto:Beverly.Boston@cms.hhs.gov> > Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov <mailto:Janet.Freeze@cms.hhs.gov> > > Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov <mailto:Kristin.Fan@cms.hhs.gov> > > Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov <mailto:Dawn.Popp@hhs.gov> > >
Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov <mailto:Martique.Jones@cms.hhs.gov> > > Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov <mailto:Gaysha.Brooks@cms.hhs.gov> > > Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov <mailto:Cynthia.Lambert-Lawson@cms.hhs.gov> > >
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Importance: High

Hi Caroline,
Any updates on when we can expect OGC comments? With the rule scheduled for publication this month, we really need to revise the rule based on CMS comments and move to HHS asap. Any help would be appreciated.
Thanks,

Annette M. Brewer -
' 410-786-6580 / (b)(6) ADS on Mondays

From: Farrell, Caroline (HHS/OGC)
Sent: Friday, November 2, 2018 3:26 PM
To: CMS Coordination_Regs_OSORA <Coordination_Regs_OSORA@cms.hhs.gov <mailto:Coordination_Regs_OSORA@cms.hhs.gov> > >; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> > >; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov <mailto:Jeremy.Silanskis@cms.hhs.gov> > >; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov <mailto:Beverly.Boston@cms.hhs.gov> > > Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov <mailto:Janet.Freeze@cms.hhs.gov> > > Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov <mailto:Kristin.Fan@cms.hhs.gov> > > Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov <mailto:Cynthia.Lambert-Lawson@cms.hhs.gov> > > Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov <mailto:Gaysha.Brooks@cms.hhs.gov> > > Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov <mailto:Dawn.Popp@hhs.gov> > >
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov <mailto:Annette.Brewer@cms.hhs.gov> > >
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

OGC is still working on this review and should be able to provide comments next week. Please check in early next week if you want a more specific update.

Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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From: CMS Coordination_Regs_OSORA
Sent: Friday, November 2, 2018 2:35 PM
To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov <mailto:Caroline.Farrell@hhs.gov> > >; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> > >; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov <mailto:Jeremy.Silanskis@cms.hhs.gov> > >; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov <mailto:Beverly.Boston@cms.hhs.gov> > > Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov <mailto:Janet.Freeze@cms.hhs.gov> > > Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov <mailto:Kristin.Fan@cms.hhs.gov> > > Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov <mailto:Cynthia.Lambert-Lawson@cms.hhs.gov> > > Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov <mailto:Gaysha.Brooks@cms.hhs.gov> > > Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov <mailto:Dawn.Popp@hhs.gov> > >
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov <mailto:Annette.Brewer@cms.hhs.gov> > >
Subject: FW: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Importance: High

Note to OGC: Clearance for CMS-2413-F was due on Tuesday, October 30, 2018. We are still pending clearance/comments from OGC. Please provide us with an update as soon as possible.

Thanks

From: CMS Coordination_Regs_OSORA
Sent: Wednesday, October 31, 2018 9:53 AM
To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov <mailto:Reg_Coordinators@cms.hhs.gov> > >; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov <mailto:CMSCMSO_REGS@cms.hhs.gov> > >; CMS OLCclearances <OLCclearances@cms.hhs.gov <mailto:OLCclearances@cms.hhs.gov> > >; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> > >; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov <mailto:Jeremy.Silanskis@cms.hhs.gov> > >; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov <mailto:Beverly.Boston@cms.hhs.gov> > > Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov <mailto:Mitch.Bryman@cms.hhs.gov> > >; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov <mailto:Nancy.Zhang@cms.hhs.gov> > >; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov <mailto:Cynthia.Lambert-Lawson@cms.hhs.gov> > > Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov <mailto:Gaysha.Brooks@cms.hhs.gov> > > Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov <mailto:Janet.Freeze@cms.hhs.gov> > > Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov <mailto:Kristin.Fan@cms.hhs.gov> > > Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov <mailto:Caroline.Farrell@hhs.gov> > >
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov <mailto:Annette.Brewer@cms.hhs.gov> > >
Subject: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Importance: High

Good Morning,

This is a friendly reminder that the clearance for CMS-2413-F are now overdue. Clearances were due October 30, 2018. Thank you.

From: CMS Coordination_Regs_OSORA
Sent: Tuesday, October 23, 2018 5:06 PM
To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov <mailto:Reg_Coordinators@cms.hhs.gov> >>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov <mailto:CMSCMSO_REGS@cms.hhs.gov> >>; CMS OLClearances <OLClearances@cms.hhs.gov <mailto:OLClearances@cms.hhs.gov> >>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> >>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov <mailto:Jeremy.Silanskis@cms.hhs.gov> >>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov <mailto:Beverly.Boston@cms.hhs.gov> >>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov <mailto:Mitch.Bryman@cms.hhs.gov> >>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov <mailto:Nancy.Zhang@cms.hhs.gov> >>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov <mailto:Cynthia.Lambert-Lawson@cms.hhs.gov> >>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov <mailto:Gaysha.Brooks@cms.hhs.gov> >>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov <mailto:Janet.Freeze@cms.hhs.gov> >>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov <mailto:Kristin.Fan@cms.hhs.gov> >>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov <mailto:Caroline.Farrell@hhs.gov> >>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov <mailto:Annette.Brewer@cms.hhs.gov> >>
Subject: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Importance: High

CMS-2413-F: Medicaid Program; Reassignment of Medicaid Provider Claims

Clearance is requested by 5 p.m., Tuesday, October 30, 2018.

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(b)(5)

If you have any questions regarding submission of clearances and comments, you may contact Cynthia Lambert-Lawson (x6-1366). Please call Chris Thompson (X6-4044) for policy related questions.

This final rule is scheduled for publication on November 30, 2018. Therefore, it is important that we receive all clearances timely. Thank you, in advance, for your prompt response.

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CHRISTOPHER THOMPSON has scheduled this WebEx meeting.

PRR: OGC Comments
Host: CHRISTOPHER THOMPSON

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Your WebEx Meeting Number (b)(5)

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Subject: FW: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

FYI..... clearance comments from OGC. I will set up an appointment for us to discuss!

Thank you,

Chris Thompson
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Division of Reimbursement & State Financing
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Centers for Medicare & Medicaid Services
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Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good morning,

Please see attached for OGC's comment on the draft Medicaid Provider Payment Reassignment NPRM.

Please let us know if you have questions and whether you would like to have a call to discuss our comments.

Thank you,

Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Importance: High

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Thanks,

Annette M. Brewer -
' 410-786-6580 (b)(6) ADS on Mondays

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Sent: Friday, November 2, 2018 3:26 PM
To: CMS Coordination_Regs_OSORA <Coordination_Regs_OSORA@cms.hhs.gov <mailto:Coordination_Regs_OSORA@cms.hhs.gov> >; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> >; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov <mailto:Jeremy.Silanskis@cms.hhs.gov> >; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov <mailto:Beverly.Boston@cms.hhs.gov> >; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov <mailto:Janet.Freeze@cms.hhs.gov> >; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov <mailto:Kristin.Fan@cms.hhs.gov> >; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov <mailto:Cynthia.Lambert-Lawson@cms.hhs.gov> >; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov <mailto:Gaysha.Brooks@cms.hhs.gov> >; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov <mailto:Dawn.Popp@hhs.gov> >
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov <mailto:Annette.Brewer@cms.hhs.gov> >
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

OGC is still working on this review and should be able to provide comments next week. Please check in early next week if you want a more specific update.

Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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From: CMS Coordination_Regs_OSORA
Sent: Friday, November 2, 2018 2:35 PM
To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov <mailto:Caroline.Farrell@hhs.gov> >; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> >; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov <mailto:Jeremy.Silanskis@cms.hhs.gov> >; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov <mailto:Beverly.Boston@cms.hhs.gov> >; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov <mailto:Janet.Freeze@cms.hhs.gov> >; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov <mailto:Kristin.Fan@cms.hhs.gov> >; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov <mailto:Cynthia.Lambert-Lawson@cms.hhs.gov> >; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov <mailto:Gaysha.Brooks@cms.hhs.gov> >; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov <mailto:Dawn.Popp@hhs.gov> >
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov <mailto:Annette.Brewer@cms.hhs.gov> >
Subject: FW: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Importance: High

Note to OGC: Clearance for CMS-2413-F was due on Tuesday, October 30, 2018. We are still pending clearance/comments from OGC. Please provide us with an update as soon as possible.

Thanks

From: CMS Coordination_Regs_OSORA
Sent: Wednesday, October 31, 2018 9:53 AM
To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov <mailto:Reg_Coordinators@cms.hhs.gov> >; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov <mailto:CMSCMSO_REGS@cms.hhs.gov> >; CMS OLCclearances <OLCclearances@cms.hhs.gov <mailto:OLCclearances@cms.hhs.gov> >; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> >; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov <mailto:Jeremy.Silanskis@cms.hhs.gov> >; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov <mailto:Beverly.Boston@cms.hhs.gov> >; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov <mailto:Mitch.Bryman@cms.hhs.gov> >; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov <mailto:Nancy.Zhang@cms.hhs.gov> >; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov <mailto:Cynthia.Lambert-Lawson@cms.hhs.gov> >; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov <mailto:Gaysha.Brooks@cms.hhs.gov> >; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov <mailto:Janet.Freeze@cms.hhs.gov> >; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov <mailto:Kristin.Fan@cms.hhs.gov> >; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov <mailto:Caroline.Farrell@hhs.gov> >
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov <mailto:Annette.Brewer@cms.hhs.gov> >
Subject: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Importance: High

Good Morning,

This is a friendly reminder that the clearance for CMS-2413-F are now overdue. Clearances were due October 30, 2018. Thank you.

From: CMS Coordination_Regs_OSORA

Sent: Tuesday, October 23, 2018 5:06 PM

To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov <mailto:Reg_Coordinators@cms.hhs.gov> >>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov <mailto:CMSCMSO_REGS@cms.hhs.gov> >>; CMS OLClearances <OLClearances@cms.hhs.gov <mailto:OLClearances@cms.hhs.gov> >>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov <mailto:Christopher.Thompson@cms.hhs.gov> >>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov <mailto:Jeremy.Silanskis@cms.hhs.gov> >>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov <mailto:Beverly.Boston@cms.hhs.gov> >>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov <mailto:Mitch.Bryman@cms.hhs.gov> >>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov <mailto:Nancy.Zhang@cms.hhs.gov> >>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov <mailto:Cynthia.Lambert-Lawson@cms.hhs.gov> >>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov <mailto:Gaysha.Brooks@cms.hhs.gov> >>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov <mailto:Janet.Freeze@cms.hhs.gov> >>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov <mailto:Kristin.Fan@cms.hhs.gov> >>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov <mailto:Caroline.Farrell@hhs.gov> >>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov <mailto:Annette.Brewer@cms.hhs.gov> >>
Subject: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Importance: High

CMS-2413-F: Medicaid Program; Reassignment of Medicaid Provider Claims

Clearance is requested by 5 p.m., Tuesday, October 30, 2018.

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(b)(5)

If you have any questions regarding submission of clearances and comments, you may contact Cynthia Lambert-Lawson (x6-1366). Please call Chris Thompson (X6-4044) for policy related questions.

This final rule is scheduled for publication on November 30, 2018. Therefore, it is important that we receive all clearances timely. Thank you, in advance, for your prompt response.

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CHRISTOPHER THOMPSON has scheduled this WebEx meeting.

PRR: OGC Comments

Host: CHRISTOPHER THOMPSON

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2. If requested, enter your name and email address.
3. If a password is required, enter the meeting password: (This meeting does not require a password.)
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5. Follow the instructions that appear on your screen.

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Hosts, need your host access code or key? Go to the meeting information page:

(b)(5)

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Brown, Sharon J. \(CMS/CMCS\)](#)
Subject: RE: 42 CFR 447.10
Date: Tuesday, October 9, 2018 5:04:00 PM

That makes sense...HCBS started in the 80's....Hmmm....Even though we are very close in time, I think this might end up being a legal question.

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Brown, Sharon J. (CMS/CMCS)
Sent: Tuesday, October 9, 2018 5:02 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: 42 CFR 447.10

Hi Chris. For 42 CFR 447.10, the GPO cites 43 FR 45253, dated Sept. 29, 1978, as amended at 46 FR 42672, dated Aug. 24, 1981; 61 FR 38398, dated July 24, 1996. I think the factoring prohibition was added in 1978 and the others were in 1981. The 1996 change was just to clean up the rule, according to my research. Thank you.

Sharon Brown | Administrative Claiming Team, Division of Reimbursement and State Financing | Financial Management Group
| Centers for Medicare & Medicaid Services | ☎: 410-456-7790 | ✉: sharon.brown@cms.hhs.gov

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Brown, Sharon J. \(CMS/CMCS\)](#)
Subject: RE: 42 CFR 447.10
Date: Tuesday, October 9, 2018 5:04:00 PM

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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Fax: (410) 786-8533

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From: Brown, Sharon J. (CMS/CMCS)
Sent: Tuesday, October 9, 2018 5:02 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: 42 CFR 447.10

Hi Chris. For 42 CFR 447.10, the GPO cites 43 FR 45253, dated Sept. 29, 1978, as amended at 46 FR 42672, dated Aug. 24, 1981; 61 FR 38398, dated July 24, 1996. I think the factoring prohibition was added in 1978 and the others were in 1981. The 1996 change was just to clean up the rule, according to my research. Thank you.

Sharon Brown | Administrative Claiming Team, Division of Reimbursement and State Financing | Financial Management Group
| Centers for Medicare & Medicaid Services | ☎: 410-456-7790 | ✉: sharon.brown@cms.hhs.gov

From: [Farrell, Caroline \(HHS/OGC\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Cc: [Brumer, Jonathan \(HHS/OGC\)](#); [Popp, Dawn \(HHS/OGC\)](#)
Subject: Re: 447.10(g)(4)
Date: Friday, October 19, 2018 12:17:47 PM

(b)(5)

On: 19 October 2018 11:42,
"Thompson, Christopher C. (CMS/CMCS)" <Christopher.Thompson@cms.hhs.gov> wrote:

Hi Caroline,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Farrell, Caroline (HHS/OGC)
Sent: Friday, October 19, 2018 11:38 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Brumer, Jonathan (HHS/OGC) <Jonathan.Brumer@HHS.GOV>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>
Subject: 447.10(g)(4)

Chris,

(b)(5)

anks,
roline

From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: RE: ADS sign in 10/5/18
Date: Friday, October 5, 2018 8:37:57 AM

Sure thing – how'd the rest of the PRR discussion go?

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Friday, October 5, 2018 8:32 AM
To: Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: ADS sign in 10/5/18

Thanks Asher!

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Mikow, Asher S. (CMS/CMCS)
Sent: Friday, October 5, 2018 6:45 AM
To: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: ADS sign in 10/5/18

Technical Director

The Centers for Medicaid and CHIP Services
Financial Management Group, Division of Reimbursement and State Financing
7500 Security Blvd., Mail Stop S3-14-28, Baltimore MD 21244

Phone 410-786-6191

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From: [Sabir, Jerimiah A. \(CMS/CMCS\)](#)
To: [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Cc: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: Analysis of the PRR Themes for the 11 am Meeting
Date: Wednesday, October 3, 2018 10:31:39 AM

Thanks, that worked. It's uploaded.

Jerimiah A. Sabir

Social Science Research Analyst
Center for Medicare & Medicaid Services (CMS)
Center for Medicaid and CHIP Services (CMCS)
Financial Management Group (FMG)
Division of Reimbursement & State Financing (DRSF)
7500 Security Blvd., Mail Stop S3-14-22
Baltimore, MD 21244
Phone: (410) 786-2239
Fax: (410) 786-8533
E-mail: Jerimiah.Sabir@cms.hhs.gov

From: Silanskis, Jeremy D. (CMS/CMCS)
Sent: Wednesday, October 3, 2018 10:26 AM
To: Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>
Cc: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: Analysis of the PRR Themes for the 11 am Meeting

Use this:

(b)(5)

From: Sabir, Jerimiah A. (CMS/CMCS)
Sent: Wednesday, October 3, 2018 10:24 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: Analysis of the PRR Themes for the 11 am Meeting

Hello Chris,

I am having trouble opening this link, nothing happens when I click on it or it just freezes up.

Jerimiah A. Sabir

Social Science Research Analyst
Center for Medicare & Medicaid Services (CMS)
Center for Medicaid and CHIP Services (CMCS)
Financial Management Group (FMG)
Division of Reimbursement & State Financing (DRSF)
7500 Security Blvd., Mail Stop S3-14-22
Baltimore, MD 21244
Phone: (410) 786-2239
Fax: (410) 786-8533
E-mail: Jerimiah.Sabir@cms.hhs.gov

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, October 3, 2018 9:59 AM
To: Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: Analysis of the PRR Themes for the 11 am Meeting

Hey Jerimiah,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Mikow, Asher S. \(CMS/CMCS\)](#)
Subject: RE: CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)
Date: Monday, November 5, 2018 2:11:00 PM

Okay, that is not a problem.

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

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From: Mikow, Asher S. (CMS/CMCS)
Sent: Monday, November 5, 2018 2:11 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

Hey Chris,

I can't be on this call because I am presenting at an IAP HCBS webinar until 4:30. If we happen to get done early I'll call in. I think I thought the webinar was only an hour so I accepted this appointment – sorry!

Thanks,

Asher

-----Original Appointment-----

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Thursday, November 1, 2018 4:55 PM

To: Thompson, Christopher C. (CMS/CMCS); Farrell, Caroline (HHS/OGC); Silanskis, Jeremy D. (CMS/CMCS); Mikow, Asher S. (CMS/CMCS)

Cc: Popp, Dawn (HHS/OGC); Brumer, Jonathan (HHS/OGC); Keating, Gerard (HHS/OGC)

Subject: CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

When: Monday, November 5, 2018 4:00 PM-4:30 PM (UTC-05:00) Eastern Time (US & Canada).

Where: WebEx Online

Hey Caroline, Dawn, and Jonathan,

Please let me know if this time does not work for you all.

Thank you,

From: Farrell, Caroline (HHS/OGC)

Sent: Thursday, November 1, 2018 4:51 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Cc: Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Brumer, Jonathan (HHS/OGC) <Jonathan.Brumer@HHS.GOV>

Subject: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

Chris,

We met with DOJ today and it is looking like we will need to discuss the following questions with CMCS:

(b)(5)

(b)(5)

Might it be possible to set up another appointment to meet about these questions?

Thank you,

Caroline L. Farrell

Attorney

Office of the General Counsel, CMS Division

United States Department of Health and Human Services

(202) 708 - 9735

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CHRISTOPHER THOMPSON has scheduled this WebEx meeting.

CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

Host: CHRISTOPHER THOMPSON

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3. If a password is required, enter the meeting password: (This meeting does not require a password.)
4. Click "Join".
5. Follow the instructions that appear on your screen.

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From: [Brumer, Jonathan \(HHS/OGC\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#)
Cc: [Popp, Dawn \(HHS/OGC\)](#); [Farrell, Caroline \(HHS/OGC\)](#)
Subject: RE: CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)
Date: Thursday, November 1, 2018 5:27:29 PM

[That would work for me.](#)

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Thursday, November 1, 2018 5:21 PM
To: Brumer, Jonathan (HHS/OGC) <Jonathan.Brumer@HHS.GOV>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>
Cc: Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>
Subject: RE: CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

Hey Jonathan,

Would 4:00pm - 4:30pm work for you all?

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

Mobile: (b)(6)

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may result in prosecution to the full extent of the law.

From: Brumer, Jonathan (HHS/OGC)

Sent: Thursday, November 1, 2018 5:14 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>

Cc: Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Subject: RE: CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

Do you have any other availability that day? Say in the morning or after 2:00 pm?

-----Original Appointment-----

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Thursday, November 1, 2018 4:55 PM

To: Farrell, Caroline (HHS/OGC); Silanskis, Jeremy D. (CMS/CMCS); Mikow, Asher S. (CMS/CMCS)

Cc: Popp, Dawn (HHS/OGC); Brumer, Jonathan (HHS/OGC)

Subject: CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

When: Monday, November 5, 2018 12:30 PM-1:30 PM (UTC-05:00) Eastern Time (US & Canada).

Where: WebEx Online

Hey Caroline, Dawn, and Jonathan,

Please let me know if this time does not work for you all.

Thank you,

From: Farrell, Caroline (HHS/OGC)

Sent: Thursday, November 1, 2018 4:51 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Cc: Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Brumer, Jonathan (HHS/OGC) <Jonathan.Brumer@HHS.GOV>

Subject: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

Chris,

We met with DOJ today and it is looking like we will need to discuss the following questions with CMCS:

(b)(5)

Might it be possible to set up another appointment to meet about these questions?

Thank you,

Caroline L. Farrell

Attorney

Office of the General Counsel, CMS Division

United States Department of Health and Human Services

(202) 708 - 9735

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DO NOT DELETE OR CHANGE ANY OF THE TEXT BELOW THIS LINE

CHRISTOPHER THOMPSON has scheduled this WebEx meeting.

CA Lawsuit - PRR: Follow up questions re. 42 C.F.R. section 447.10(g)(4)

Host: CHRISTOPHER THOMPSON

Access Information

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4. Click "Join".
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+++++

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+++++

Hosts, need your host access code or key? Go to the meeting information page:

(b)(5)

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The meetings.cms.gov team

From: [Fan, Kristin A. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#)
Cc: [Boston, Beverly A. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: RE: CMS 2413-P Provider Reassignment Proposed Rule - Legal Comments- Discussion with OGC
Date: Wednesday, September 19, 2018 4:23:52 PM

Thanks for the update.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, September 19, 2018 3:28 PM
To: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>
Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: FW: CMS 2413-P Provider Reassignment Proposed Rule - Legal Comments- Discussion with OGC

Hey Kristin,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, September 18, 2018 12:58 PM
To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Fisher, Barbara (HHS/OGC) <Barbara.Fisher@HHS.GOV>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>
Subject: RE: CMS 2413-P Provider Reassignment Proposed Rule - Legal Comments

Good Afternoon Caroline, Barbara, and Dawn,

I wanted to follow up on the e-mail I sent last week. I am available to meet with you all any time that works with your schedule.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: Thompson, Christopher C. (CMS/CMCS)
Sent: Thursday, September 13, 2018 11:29 AM
To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Fisher, Barbara (HHS/OGC) <Barbara.Fisher@HHS.GOV>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>
Subject: CMS 2413-P Provider Reassignment Proposed Rule - Legal Comments

Good Morning Caroline,

Page 182 redacted for the following reason:

(b)(5), attorney - client

• [REDACTED] (b)(5)

If you want to set up a meeting to walk through some of these comments, we can do so at your earliest convenience. This is priority one for me so I can be available for any time that fits into your schedule.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: [REDACTED] (b)(6)
Fax: (410) 786-8533

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From: [Boston, Beverly A. \(CMS/CMCS\)](#)
To: [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: CMS-2413-F Medicaid Program; Reassignment of Medicaid Provider Claims
Date: Tuesday, November 20, 2018 3:08:55 PM

Also, Gaysha is on the string and given OGC's response she will not accept the reg until they've cleared it.

Beverly

From: Boston, Beverly A. (CMS/CMCS)
Sent: Tuesday, November 20, 2018 3:03 PM
To: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: CMS-2413-F Medicaid Program; Reassignment of Medicaid Provider Claims

I agree, we're not good to go until all issues are addressed and OGC has cleared any revisions be returned to OSORA.

Beverly

From: Silanskis, Jeremy D. (CMS/CMCS)
Sent: Tuesday, November 20, 2018 2:55 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: CMS-2413-F Medicaid Program; Reassignment of Medicaid Provider Claims

(b)(5)

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, November 20, 2018 2:50 PM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: FW: CMS-2413-F Medicaid Program; Reassignment of Medicaid Provider Claims

This throws somewhat of a monkey wrench in our plans to have this back into clearance tomorrow!

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28

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From: Farrell, Caroline (HHS/OGC)

Sent: Tuesday, November 20, 2018 1:42 PM

To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Fisher, Barbara (HHS/OGC)

<Barbara.Fisher@HHS.GOV>; Thompson, Christopher C. (CMS/CMCS)

<Christopher.Thompson@cms.hhs.gov>

Subject: RE: CMS-2413-F Medicaid Program; Reassignment of Medicaid Provider Claims

(b)(5)

Please let me know if you want to discuss more.

Thanks,

Caroline L. Farrell

Attorney

Office of the General Counsel, CMS Division

United States Department of Health and Human Services

(202) 708 - 9735

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From: Brooks, Gaysha M. (CMS/OSORA)

Sent: Tuesday, November 20, 2018 11:54 AM

To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Subject: CMS-2413-F Medicaid Program; Reassignment of Medicaid Provider Claims

Hi Caroline,

(b)(5)

Thanks,
Gaysha

From: [Brooks, Gaysha M. \(CMS/OSORA\)](#)
To: [Farrell, Caroline \(HHS/OGC\)](#)
Cc: [Popp, Dawn \(HHS/OGC\)](#); [Fisher, Barbara \(HHS/OGC\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#); [Brewer, Annette M. \(CMS/OSORA\)](#)
Subject: RE: CMS-2413-F Medicaid Program; Reassignment of Medicaid Provider Claims
Date: Tuesday, November 20, 2018 3:07:34 PM

Thanks for your feedback. We will not advance the rule to HHS, but we plan to submit it for CMS reclearance. Issues still under development should be noted as "still pending final decisions".

Thanks

From: Farrell, Caroline (HHS/OGC)
Sent: Tuesday, November 20, 2018 1:42 PM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Fisher, Barbara (HHS/OGC) <Barbara.Fisher@HHS.GOV>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: CMS-2413-F Medicaid Program; Reassignment of Medicaid Provider Claims

(b)(5)

Please let me know if you want to discuss more.

Thanks,
Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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From: Brooks, Gaysha M. (CMS/OSORA)

Sent: Tuesday, November 20, 2018 11:54 AM

To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Subject: CMS-2413-F Medicaid Program; Reassignment of Medicaid Provider Claims

Hi Caroline,


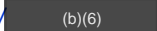
(b)(5)

Thanks,
Gaysha

From: [Brewer, Annette M. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Brooks, Gaysha M. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#)
Subject: RE: CMS-2413-P; Medicaid Program; Reassignment of Medicaid Provider Claims
Date: Wednesday, April 4, 2018 6:51:07 AM
Importance: High

Good morning,
Following up on the timing of the revisions. HHS is asking when we will resubmit. Please advise.
Thanks,


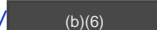
Annette M. Brewer 

 410-786-6580 /  (b)(6) **ADS on Mondays**

From: Brewer, Annette M. (CMS/OSORA)
Sent: Tuesday, April 3, 2018 10:38 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: CMS-2413-P; Medicaid Program; Reassignment of Medicaid Provider Claims

(b)(5)

Annette M. Brewer 

 410-786-6580 /  (b)(6) **ADS on Mondays**

From: [Boston, Beverly A. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: DUE MON 11/5: HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F
Date: Friday, November 2, 2018 5:15:03 PM

Please provide the separate paper

Beverly

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Friday, November 2, 2018 3:45 PM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>
Subject: RE: DUE MON 11/5: HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F

Hey Beverly,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
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From: Boston, Beverly A. (CMS/CMCS)

Sent: Wednesday, October 31, 2018 11:30 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>

Subject: DUE MON 11/5: HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F

Hello,

Lela forwarded the string to me. See attached HHS Reviewers briefing paper used for the PRR NPRM. Please update for the final rule briefing. Please cc: me when you respond back to OSORA so I have a record of the action and date for the reviewers briefing.

Thanks

Beverly

From: Teal, Lela (CMS/CMCS)

Sent: Wednesday, October 31, 2018 7:39 AM

To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>

Subject: FW: HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F

Please see below

From: Barco, Evell J. (CMS/OSORA)

Sent: Tuesday, October 30, 2018 5:55 PM

To: Harshman, Sara (CMS/CMCS) <Sara.Harshman@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>

Cc: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F

Hello,

Since we have completed OA briefings and the rule has been submitted for CMS review, I am preparing for next steps. When the rule is submitted to HHS for review (date currently uncertain), the HHS reviewers paper should accompany it. Please provide a briefing paper by Monday, Nov 5 to ensure it moves timely.

Please contact me if you have questions. Thanks.

From: [Badaracco, Andrew \(CMS/CMCS\)](#)
To: [Rupley, Cheryl A. \(CMS/CMCHO\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: Guidance Request: Medicaid Reimbursement for Residents/Fellows
Date: Friday, June 1, 2018 9:10:32 AM

Hi Cheryl,

So, if I can summarize, it sounds like the state is asking if a resident fellow can provide physician services under the supervision of a physician under the physician benefit. That's a question, I believe, for coverage to confirm.

From a payment perspective, if the state has fee schedules that pay for physician services, such a payment would go to the supervising physician which he/she would then use to compensate the resident under a normal employment relationship as described in 447.10. We don't make two payments for one service. Additionally, it wouldn't be consider GME.

Look forward to our discussion next week.

Andrew

From: Rupley, Cheryl A. (CMS/CMCHO)
Sent: Friday, June 1, 2018 8:43 AM
To: Badaracco, Andrew (CMS/CMCS) <Andrew.Badaracco@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: FW: Guidance Request: Medicaid Reimbursement for Residents/Fellows

Andrew/Chris,
Here are the detailed questions for the call. I attached them to the email also.
Thanks.

Cheryl Rupley
LA State Rep
214-767-6278

From: Marjorie Jenkins [<mailto:Marjorie.Jenkins@LA.GOV>]
Sent: Friday, June 1, 2018 7:29 AM
To: Rupley, Cheryl A. (CMS/CMCHO) <Cheryl.Rupley@cms.hhs.gov>
Cc: Karen Barnes (LDH) <Karen.Barnes@LA.GOV>; Roberta Diaz <ROBERTA.DIAZ@LA.GOV>
Subject: RE: Guidance Request: Medicaid Reimbursement for Residents/Fellows

Good morning, Cheryl:

These are the questions the State has regarding Medicaid reimbursement for residents/fellows:

1. Can Child-Adolescent Fellows under supervision as part of their GME/Fellowship program,

who are independently-licensed in Louisiana, and who have completed their internship and general psychiatry residency, be reimbursed using SGF and Medicaid matched dollars for Louisiana State Plan-approved Medicaid services provided to Medicaid-eligible youth?

2. Given that these postgraduate year-5 (PGY-5) Child and Adolescent Fellows are licensed by the Louisiana State Board of Medical Examiners, are there ANY restrictions on how they might be reimbursed for provision of medically necessary services to Medicaid-eligible recipients, even as they are under supervision as part of their GME fellowship? (e.g., restrictions on use of Medicaid dollars, state general fund (SGF) dollars, Mental Health Services Block Grant (MHBG) or SAPBT dollars, other?)

3. Are there any restrictions related to payment of Supervisors of such fellows? (While we are not paying them for direct services when only engaged in supervision activities of their PGY-5 fellows, we would like to make sure it is permissible to pay these supervisors with Louisiana SGF or other non-Medicaid/non-Medicare dollars.)

4. Is there any CMS written guidance on reimbursement of PGY-5 and above subspecialist fellows in training?

Thank you and have a fantastic Friday!

-Marjorie

From: Marjorie Jenkins

Sent: Thursday, May 31, 2018 3:18 PM

To: 'Rupley, Cheryl A. (CMS/CMCHO)' <Cheryl.Rupley@cms.hhs.gov>

Cc: Karen Barnes (LDH) <Karen.Barnes@LA.GOV>; Roberta Diaz <ROBERTA.DIAZ@LA.GOV>

Subject: Guidance Request: Medicaid Reimbursement for Residents/Fellows

Good afternoon, Cheryl:

The State has questions regarding Medicaid reimbursement for residents/fellows and is available on the following dates/times (all Central times):

Monday, June 4: 8:00 – 9:00 a.m., 9:00 – 10:00 a.m. or 2:00 - 3:00 p.m.

Tuesday, June 5: 8:00 – 9:00 a.m., 11:00 a.m. – noon, 3:00 – 4:00 p.m. or 3:30 – 4:30 p.m.

Wednesday, June 6: 11:00 a.m.- noon or 11:30 a.m. – 12:30 p.m.

Thursday, June 7: 3:00 p.m. - 4:00 p.m. or 3:30 p.m. – 4:30 p.m.

Friday, June 8: Any time before noon

Thank you,

Marjorie

☎ (225) 342-6375



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From: [Fan, Kristin A. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Cc: [Freeze, Janet G. \(CMS/CMCS\)](#)
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)
Date: Friday, June 1, 2018 1:31:36 PM

Let me know when it is scheduled. If I'm available I'd like to listen.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Friday, June 1, 2018 11:46 AM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>
Cc: Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Thank you Gaysha,

Evell, I will be reaching out to you shortly to set up a call. Caroline Farrell will be the OGC staff person that will participate in the call.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Friday, June 1, 2018 11:42 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>
Cc: Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hi Chris,

Thanks for the update (b)(5)
(b)(5) I have included Evell on this email.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Friday, June 1, 2018 11:24 AM
To: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Cc: Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hi Cynthia,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044

Mobile: (b)(6)
Fax: (410) 786-8533

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Subject: FW: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

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Chris Thompson
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Sent: Thursday, May 31, 2018 4:25 PM
To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hi Caroline,

10:00 am – 10:30 am works perfectly for me. I will call you directly at (202) 708-9735.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
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Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Chris,

Sorry for the delay in getting back to you. I am still digging through emails after being out for the long weekend.

It might be most efficient if we got on the phone to discuss your email. Might you be free tomorrow morning? I can talk from 10-1030 or 11-1130, but am otherwise almost all booked up tomorrow.

Thank you,
Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
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Sent: Tuesday, May 29, 2018 9:30 AM

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<Vanessa.Garcia@cms.hhs.gov>; Cavanaugh, Alicia A. (CMS/OSORA)
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Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA)
<Ruth.Miller@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>;
Richmond, Carly M. (CMS/OSORA) <carly.richmond@cms.hhs.gov>; Wickliffe, Jim (CMS/OSORA)
<Jim.Wickliffe@cms.hhs.gov>

Subject: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hello All-
As of today, HHS clearance is complete.

Comments: *OGC (attached)*

Thanks,
Trenesha

From: Brooks, Gaysha M. (CMS/OSORA)

Sent: Tuesday, May 15, 2018 2:35 PM

To: Shelton, Carrie A (HHS/IOS) <Carrie.Shelton@HHS.GOV>; Barco, Evell J. (CMS/OSORA)
<Evell.Barco@cms.hhs.gov>

Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA)
<Sheli.Harris@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>;
Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia
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<Vanessa.Garcia@cms.hhs.gov>; Wilson, Lynette N. (CMS/OSORA) <Lynette.Wilson@cms.hhs.gov>

Subject: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS 2413-P)— CLEARANCE REQUEST

Action Requested: We have attached a redline-strikeout markup and a revised document for HHS and OMB clearance. **We wish to display this rule by June 22, 2018.** We are requesting HHS and OMB comments by Friday, May 25th. **This is pre-decisional information and distribution should be limited to only those staff who must review and clear it.**

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Thank you for your help in expediting the publication of this proposed rule.

Attachments:

--Master FR Document

--Redline/Strikeout Markup

--Responses to Comments that Required Further Explanation or Did Not Require Changes to the Rule

From: [Fan, Kristin A. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#)
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)
Date: Friday, June 1, 2018 12:32:15 PM

Thanks Chris – but very odd.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Friday, June 1, 2018 12:03 PM
To: Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hi Kristin,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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Sent: Friday, June 1, 2018 11:24 AM

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Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

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Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

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Subject: FW: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hi Cynthia,

I wanted to provide you with a status update! I am seeking clarification from OGC with regard to some of their comments and I will be talking to them tomorrow morning. As such, I plan to have the pass-back to you all by early afternoon at the latest.

Thank you,

Chris Thompson
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Comments: *OGC (attached)*

Thanks,
Trenesha

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Sent: Tuesday, May 15, 2018 2:35 PM

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To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Brooks, Gaysha M. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Brewer, Annette M. \(CMS/OSORA\)](#)
Cc: [Freeze, Janet G. \(CMS/CMCS\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#)
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)
Date: Friday, June 1, 2018 11:49:18 AM

Ok, thanks Chris.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Friday, June 1, 2018 11:46 AM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>
Cc: Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Thank you Gaysha,

Evell, I will be reaching out to you shortly to set up a call. Caroline Farrell will be the OGC staff person that will participate in the call.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Brooks, Gaysha M. (CMS/OSORA)

Sent: Friday, June 1, 2018 11:42 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>

Cc: Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>

Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hi Chris,

Thanks for the update. (b)(5)

(b)(5)

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Friday, June 1, 2018 11:24 AM

To: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Cc: Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>

Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hi Cynthia,

(b)(5)

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

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Mobile: (b)(6)

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From: Thompson, Christopher C. (CMS/CMCS)

Sent: Thursday, May 31, 2018 5:02 PM

To: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: FW: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hi Cynthia,

I wanted to provide you with a status update! I am seeking clarification from OGC with regard to some of their comments and I will be talking to them tomorrow morning. As such, I plan to have the pass-back to you all by early afternoon at the latest.

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

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From: Thompson, Christopher C. (CMS/CMCS)

Sent: Thursday, May 31, 2018 4:25 PM

To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hi Caroline,

10:00 am – 10:30 am works perfectly for me. I will call you directly at (202) 708-9735.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Farrell, Caroline (HHS/OGC)
Sent: Thursday, May 31, 2018 4:22 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Chris,

Sorry for the delay in getting back to you. I am still digging through emails after being out for the long weekend.

It might be most efficient if we got on the phone to discuss your email. Might you be free tomorrow

morning? I can talk from 10-1030 or 11-1130, but am otherwise almost all booked up tomorrow.

Thank you,
Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, May 30, 2018 2:19 PM
To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hi Caroline,

(b)(5)

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Fultz-Mimms, Trenesha N. (CMS/OSORA)

Sent: Tuesday, May 29, 2018 9:30 AM

To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>

Cc: Wilson, Lynette N. (CMS/OSORA) <Lynette.Wilson@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Cavanaugh, Alicia A. (CMS/OSORA) <Alicia.Cavanaugh@cms.hhs.gov>; Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Richmond, Carly M. (CMS/OSORA) <carly.richmond@cms.hhs.gov>; Wickliffe, Jim (CMS/OSORA) <Jim.Wickliffe@cms.hhs.gov>

Subject: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hello All-
As of today, HHS clearance is complete.

Comments: OGC (attached)

Thanks,
Trenesha

From: Brooks, Gaysha M. (CMS/OSORA)

Sent: Tuesday, May 15, 2018 2:35 PM

To: Shelton, Carrie A (HHS/IOS) <Carrie.Shelton@HHS.GOV>; Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>

Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Wilson, Lynette N. (CMS/OSORA) <Lynette.Wilson@cms.hhs.gov>

Subject: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS 2413-P)— CLEARANCE REQUEST

Action Requested: We have attached a redline-strikeout markup and a revised document for HHS and OMB clearance. **We wish to display this rule by June 22, 2018.** We are requesting HHS and OMB comments by Friday, May 25th. **This is pre-decisional information and distribution should be limited to only those staff who must review and clear it.**

Summary of Changes: We received comments from ACL, ASL, ASPE, OGC, and the May 3rd OMB passback. We have addressed the comments and have incorporated them in the revised document, as indicated in the attached redline-strikeout markup. Comments requiring responses are outlined in the attached document.

Thank you for your help in expediting the publication of this proposed rule.

Attachments:

--Master FR Document

--Redline/Strikeout Markup

--Responses to Comments that Required Further Explanation or Did Not Require Changes to the Rule

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Farrell, Caroline \(HHS/OGC\)](#)
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)
Date: Thursday, May 31, 2018 4:31:00 PM

Sure, a meeting invite with a dial-in will follow shortly.

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: Farrell, Caroline (HHS/OGC)
Sent: Thursday, May 31, 2018 4:26 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

I may be working from home because I am having a medical procedure in the afternoon. Can you set up a dial-in?

Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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From: Thompson, Christopher C. (CMS/CMCS)

Sent: Thursday, May 31, 2018 4:25 PM

To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>

Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hi Caroline,

10:00 am – 10:30 am works perfectly for me. I will call you directly at (202) 708-9735.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
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From: Farrell, Caroline (HHS/OGC)

Sent: Thursday, May 31, 2018 4:22 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>

Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

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Sent: Wednesday, May 30, 2018 2:19 PM
To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hi Caroline,

(b)(5)

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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<Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
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Hello All-
As of today, HHS clearance is complete.

Comments: OGC (attached)

Thanks,
Trenesha

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Sent: Tuesday, May 15, 2018 2:35 PM
To: Shelton, Carrie A (HHS/IOS) <Carrie.Shelton@HHS.GOV>; Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>
Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Wilson, Lynette N. (CMS/OSORA) <Lynette.Wilson@cms.hhs.gov>
Subject: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS 2413-P)— CLEARANCE REQUEST

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--Redline/Strikeout Markup

--Responses to Comments that Required Further Explanation or Did Not Require Changes to the Rule

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To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Cc: [Freeze, Janet G. \(CMS/CMCS\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#); [Brooks, Gaysha M. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#)
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)
Date: Monday, June 11, 2018 11:10:30 AM

Ok, thank you for the update.

Annette M. Brewer 

 410-786-6580 /  (b)(6) **ADS on Mondays**

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, June 11, 2018 11:05 AM
To: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hi Annette,

I am about to send some revised language to Caroline Farrell. Once Kelly Cleary clears the language, I will be able to forward the revised regulation to you.

Thank you,


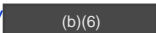
Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile:  (b)(6)
Fax: (410) 786-8533

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From: Brewer, Annette M. (CMS/OSORA)
Sent: Monday, June 11, 2018 11:01 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hi,
Do you have any updates on when we will receive CMCS revisions?

Annette M. Brewer 

 410-786-6580 /  (b)(6) **ADS on Mondays**

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Friday, June 1, 2018 11:46 AM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>
Cc: Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Thank you Gaysha,

Evell, I will be reaching out to you shortly to set up a call. Caroline Farrell will be the OGC staff person that will participate in the call.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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Mobile:  (b)(6)

Fax: (410) 786-8533

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From: Brooks, Gaysha M. (CMS/OSORA)

Sent: Friday, June 1, 2018 11:42 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>

Cc: Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>

Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hi Chris,

Thanks for the update.

(b)(5)

(b)(5)

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Friday, June 1, 2018 11:24 AM

To: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Cc: Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>

Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hi Cynthia,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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Fax: (410) 786-8533

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From: Thompson, Christopher C. (CMS/CMCS)
Sent: Thursday, May 31, 2018 5:02 PM
To: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Subject: FW: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hi Cynthia,

I wanted to provide you with a status update! I am seeking clarification from OGC with regard to some of their comments and I will be talking to them tomorrow morning. As such, I plan to have the pass-back to you all by early afternoon at the latest.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)

Fax: (410) 786-8533

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From: Thompson, Christopher C. (CMS/CMCS)
Sent: Thursday, May 31, 2018 4:25 PM
To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hi Caroline,

10:00 am – 10:30 am works perfectly for me. I will call you directly at (202) 708-9735.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: Farrell, Caroline (HHS/OGC)
Sent: Thursday, May 31, 2018 4:22 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>

Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Chris,

Sorry for the delay in getting back to you. I am still digging through emails after being out for the long weekend.

It might be most efficient if we got on the phone to discuss your email. Might you be free tomorrow morning? I can talk from 10-1030 or 11-1130, but am otherwise almost all booked up tomorrow.

Thank you,
Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, May 30, 2018 2:19 PM
To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hi Caroline,

(b)(5)

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: Fultz-Mimms, Trenesha N. (CMS/OSORA)

Sent: Tuesday, May 29, 2018 9:30 AM

To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Cc: Wilson, Lynette N. (CMS/OSORA) <Lynette.Wilson@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Cavanaugh, Alicia A. (CMS/OSORA) <Alicia.Cavanaugh@cms.hhs.gov>; Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Richmond, Carly M. (CMS/OSORA) <carly.richmond@cms.hhs.gov>; Wickliffe, Jim (CMS/OSORA) <Jim.Wickliffe@cms.hhs.gov>
Subject: HHS CLEARANCE COMPLETE / OGC comments--Provider Payment Reassignment (CMS-2413-P)

Hello All-

As of today, HHS clearance is complete.

Comments: *OGC (attached)*

Thanks,
Trenesha

From: Brooks, Gaysha M. (CMS/OSORA)

Sent: Tuesday, May 15, 2018 2:35 PM

To: Shelton, Carrie A (HHS/IOS) <Carrie.Shelton@HHS.GOV>; Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>

Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Wilson, Lynette N. (CMS/OSORA) <Lynette.Wilson@cms.hhs.gov>

Subject: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS 2413-P)— CLEARANCE REQUEST

Action Requested: We have attached a redline-strikeout markup and a revised document for

HHS and OMB clearance. **We wish to display this rule by June 22, 2018.** We are requesting HHS and OMB comments by Friday, May 25th. **This is pre-decisional information and distribution should be limited to only those staff who must review and clear it.**

Summary of Changes: We received comments from ACL, ASL, ASPE, OGC, and the May 3rd OMB passback. We have addressed the comments and have incorporated them in the revised document, as indicated in the attached redline-strikeout markup. Comments requiring responses are outlined in the attached document.

Thank you for your help in expediting the publication of this proposed rule.

Attachments:

--Master FR Document

--Redline/Strikeout Markup

--Responses to Comments that Required Further Explanation or Did Not Require Changes to the Rule

From: [Barco, Evell J. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Cc: [Fan, Kristin A. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#)
Subject: Re: HHS Reviewers Briefing Paper
Date: Tuesday, April 10, 2018 8:45:08 AM

Great. Thanks.

Sent from my iPhone

On Apr 10, 2018, at 7:31 AM, Thompson, Christopher C. (CMS/CMCS)
<Christopher.Thompson@cms.hhs.gov> wrote:

Good Morning Evell,

Attached is the version of the Reviewer's Briefing Paper that was cleared by the FMG front office.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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<Proposed Rule briefing paper for HHS principals briefing - CMS 2413-P
Re....docx>

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Barco, Evell J. \(CMS/OSORA\)](#)
Subject: RE: HHS Reviewers Briefing- Reassignment of Medicaid Provider Claims -- CMS-2413-F
Date: Friday, December 7, 2018 2:12:00 PM

Hi Evell,

Yes, I will be the presenter.

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Barco, Evell J. (CMS/OSORA)
Sent: Friday, December 7, 2018 1:13 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: FW: HHS Reviewers Briefing- Reassignment of Medicaid Provider Claims -- CMS-2413-F

Hi Chris,
Will you be the presenter for this briefing?

From: Boston, Beverly A. (CMS/CMCS)
Sent: Friday, December 7, 2018 12:25 PM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Harshman, Sara (CMS/CMCS) <Sara.Harshman@cms.hhs.gov>
Subject: RE: HHS Reviewers Briefing- Reassignment of Medicaid Provider Claims -- CMS-2413-F

Paper attached.

Thanks

Beverly

From: Boston, Beverly A. (CMS/CMCS)
Sent: Friday, December 7, 2018 12:18 PM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Harshman, Sara (CMS/CMCS) <Sara.Harshman@cms.hhs.gov>
Subject: RE: HHS Reviewers Briefing- Reassignment of Medicaid Provider Claims -- CMS-2413-F

Noon is fine. I'm checking on paper and will get back to you.

Thanks

Beverly

From: Barco, Evell J. (CMS/OSORA)
Sent: Friday, December 7, 2018 12:12 PM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Harshman, Sara (CMS/CMCS) <Sara.Harshman@cms.hhs.gov>
Subject: Re: HHS Reviewers Briefing- Reassignment of Medicaid Provider Claims -- CMS-2413-F

Hi

The dept cannot make 10:30 work.

They are available Tues as follows:

Noon

2pm

3:30pm

5pm

Do you think paper will be ready today?

Sent from my iPhone

On Dec 7, 2018, at 11:18 AM, Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov> wrote:

Hi Evell,

Confirming that the rule is in concurrent CMS (comments due 12/11) and HHS (comments due 12/13) clearances? Also, can the HHS briefing take place on Tues 10/12 at 10:30am? Monday is packed. We'll provide the briefing paper.

Thank you

Beverly

From: Barco, Evell J. (CMS/OSORA)

Sent: Thursday, December 6, 2018 10:48 AM

To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Harshman, Sara (CMS/CMCS) <Sara.Harshman@cms.hhs.gov>

Cc: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>

Subject: HHS Reviewers Briefing- Reassignment of Medicaid Provider Claims -- CMS-2413-F

Good morning,

This rule was submitted to HHS for clearance this morning with comments due Thurs, Dec 13. The Dept is requesting a briefing Monday afternoon on Dec 10.

1. Please confirm your availability for the briefing.
2. Please determine if any changes are necessary to the briefing material you submitted in early Nov.
3. Identify the presenter(s).

Thanks.

From: [Barco, Evell J. \(CMS/OSORA\)](#)
To: [Boston, Beverly A. \(CMS/CMCS\)](#)
Cc: [Fan, Kristin A. \(CMS/CMCS\)](#); [Farrell, Caroline \(HHS/OGC\)](#); [Fultz-Mimms, Trenesha N. \(CMS/OSORA\)](#); [Popp, Dawn \(HHS/OGC\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#); [Teal, Lela \(CMS/CMCS\)](#); [Mack, Rosa \(CMS/CMCS\)](#); [Harshman, Sara \(CMS/CMCS\)](#)
Subject: Re: HHS Reviewers Briefing- Reassignment of Medicaid Provider Claims -- CMS-2413-F
Date: Friday, December 7, 2018 12:50:16 PM

Thanks

Sent from my iPhone

On Dec 7, 2018, at 12:25 PM, Boston, Beverly A. (CMS/CMCS)
<Beverly.Boston@cms.hhs.gov> wrote:

Paper attached.

Thanks

Beverly

From: Boston, Beverly A. (CMS/CMCS)
Sent: Friday, December 7, 2018 12:18 PM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Harshman, Sara (CMS/CMCS) <Sara.Harshman@cms.hhs.gov>
Subject: RE: HHS Reviewers Briefing- Reassignment of Medicaid Provider Claims -- CMS-2413-F

Noon is fine. I'm checking on paper and will get back to you.

Thanks

Beverly

From: Barco, Evell J. (CMS/OSORA)
Sent: Friday, December 7, 2018 12:12 PM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>

Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Harshman, Sara (CMS/CMCS) <Sara.Harshman@cms.hhs.gov>
Subject: Re: HHS Reviewers Briefing- Reassignment of Medicaid Provider Claims -- CMS-2413-F

Hi
The dept cannot make 10:30 work.
They are available Tues as follows:
Noon
2pm
3:30pm
5pm
Do you think paper will be ready today?

Sent from my iPhone

On Dec 7, 2018, at 11:18 AM, Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov> wrote:

Hi Evell,

Confirming that the rule is in concurrent CMS (comments due 12/11) and HHS (comments due 12/13) clearances? Also, can the HHS briefing take place on Tues 10/12 at 10:30am? Monday is packed. We'll provide the briefing paper.

Thank you

Beverly

From: Barco, Evell J. (CMS/OSORA)
Sent: Thursday, December 6, 2018 10:48 AM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS)

<Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS)
<Christopher.Thompson@cms.hhs.gov>; Teal, Lela (CMS/CMCS)
<Lela.Teal@cms.hhs.gov>; Mack, Rosa (CMS/CMCS)
<Rosa.Mack@cms.hhs.gov>; Harshman, Sara (CMS/CMCS)
<Sara.Harshman@cms.hhs.gov>

Cc: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>

Subject: HHS Reviewers Briefing- Reassignment of Medicaid Provider
Claims -- CMS-2413-F

Good morning,

This rule was submitted to HHS for clearance this morning with comments due Thurs, Dec 13. The Dept is requesting a briefing Monday afternoon on Dec 10.

- <!--[if !supportLists]-->1. <!--[endif]-->Please confirm your availability for the briefing.
- <!--[if !supportLists]-->2. <!--[endif]-->Please determine if any changes are necessary to the briefing material you submitted in early Nov.
- <!--[if !supportLists]-->3. <!--[endif]-->Identify the presenter(s).

Thanks.

<Briefing paper for HHS Reviewers.docx>

From: [Barco, Evell J. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F
Date: Wednesday, October 31, 2018 2:55:19 PM

Yes.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, October 31, 2018 2:37 PM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>
Subject: RE: HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F

Hi Evell,

Would 3:30pm today work?

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Barco, Evell J. (CMS/OSORA)
Sent: Wednesday, October 31, 2018 2:22 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: FW: HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F

Hi Chris,
Would you give me a call this afternoon? What time works for you?

From: Teal, Lela (CMS/CMCS)
Sent: Wednesday, October 31, 2018 7:39 AM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Harshman, Sara (CMS/CMCS)

<Sara.Harshman@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>

Cc: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: RE: HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F

Will do, thank you

From: Barco, Evell J. (CMS/OSORA)

Sent: Tuesday, October 30, 2018 5:55 PM

To: Harshman, Sara (CMS/CMCS) <Sara.Harshman@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>

Cc: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F

Hello,

Since we have completed OA briefings and the rule has been submitted for CMS review, I am preparing for next steps. When the rule is submitted to HHS for review (date currently uncertain), the HHS reviewers paper should accompany it. Please provide a briefing paper by Monday, Nov 5 to ensure it moves timely.

Please contact me if you have questions. Thanks.

From: [Brooks, Gaysha M. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#); [Brewer, Annette M. \(CMS/OSORA\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Cc: [Lafferty, Tiffany R. \(CMS/OSORA\)](#); [Hubbard, Lisa A. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#)
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Date: Monday, December 3, 2018 11:19:38 AM

Ok, thanks for the update.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, December 3, 2018 11:18 AM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Gaysha,

Revisions will be sent to you all by COB today.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Monday, December 3, 2018 11:16 AM
To: Boston, Beverly A. (CMS/CMCS) <[Beverly.Boston@cms.hhs.gov](#)>; Thompson, Christopher C. (CMS/CMCS) <[Christopher.Thompson@cms.hhs.gov](#)>; Brewer, Annette M. (CMS/OSORA)

<Annette.Brewer@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS)

<Jeremy.Silanskis@cms.hhs.gov>

Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A.

(CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA)

<Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning,

We are following up on the status of CMS-2413-F. Please let us know when revisions are expected.

Thanks

From: Boston, Beverly A. (CMS/CMCS)

Sent: Friday, November 30, 2018 4:39 PM

To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Thompson, Christopher C.

(CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA)

<Annette.Brewer@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS)

<Jeremy.Silanskis@cms.hhs.gov>

Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A.

(CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA)

<Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Gaysha and Tiffany,

Chris will respond on the status, but in the interim, can you tell me what is new December publication date we're working toward? I need to update other trackers with this information.

Thanks

Beverly

From: Brooks, Gaysha M. (CMS/OSORA)

Sent: Friday, November 30, 2018 1:45 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brewer,

Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS)

<Jeremy.Silanskis@cms.hhs.gov>

Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A.

(CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA)

<Cynthia.Lambert-Lawson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS)

<Beverly.Boston@cms.hhs.gov>

Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Chris,

Please provide us with an update for CMS-2413-F.

Thanks

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, November 27, 2018 4:43 PM
To: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Annette,

We are hoping to have the legal issues resolved and the revisions wrapped up by the end of the week at the latest.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Brewer, Annette M. (CMS/OSORA)
Sent: Tuesday, November 27, 2018 7:29 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA)

<Gaysha.Brooks@cms.hhs.gov>

Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good morning,
Any updates on the timing of the revisions?

Annette M. Brewer 



410-786-6580

(b)(6)

ADS on Mondays

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Wednesday, November 21, 2018 8:15 AM

To: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>

Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning Cynthia,

I am attaching a note that OGC sent to OSORA yesterday.

(b)(5)

(b)(5)

and while we initially anticipated putting the rule back into clearance today, we are now hoping to put it back into clearance early next week.

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

Mobile: (b)(6)

Fax: (410) 786-8533

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From: Lambert-Lawson, Cynthia (CMS/OSORA)

Sent: Wednesday, November 21, 2018 7:29 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis,

Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>

Subject: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning Chris,

To update management, what is the ETA in receiving the revised draft for CMS-2413-F ?

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, November 19, 2018 12:42 PM

To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Gaysha,

Thank you and yes were on still on schedule with regard to 11/21 submission date.

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

Mobile: (b)(6)

Fax: (410) 786-8533

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From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Monday, November 19, 2018 11:45 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

(b)(5)

Are you still on schedule to send the revisions on 11/21.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, November 19, 2018 11:40 AM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Gaysha,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044

Mobile: (b)(6)
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From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Tuesday, November 13, 2018 10:11 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Cc: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning,

Please provide us with an update on when the revised draft will be sent.

Thanks

From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Friday, November 9, 2018 11:44 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Cc: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Chris,

Now that CMS clearance is complete, please let us know when the revised draft will be sent.

Thanks

From: Farrell, Caroline (HHS/OGC)

Sent: Friday, November 9, 2018 11:17 AM

To: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good morning,

Please see attached for OGC's comment on the draft Medicaid Provider Payment Reassignment NPRM.

Please let us know if you have questions and whether you would like to have a call to discuss our comments.

Thank you,

Caroline L. Farrell

Attorney

Office of the General Counsel, CMS Division

United States Department of Health and Human Services

(202) 708 - 9735

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From: Brewer, Annette M. (CMS/OSORA)

Sent: Tuesday, November 6, 2018 11:18 AM

To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

Hi Caroline,

Any updates on when we can expect OGC comments? With the rule scheduled for publication this month, we really need to revise the rule based on CMS comments and move to HHS asap. Any help would be appreciated.

Thanks,

Annette M. Brewer 



410-786-6580

(b)(6)

ADS on Mondays

From: Farrell, Caroline (HHS/OGC)

Sent: Friday, November 2, 2018 3:26 PM

To: CMS Coordination_Regs_OSORA <Coordination_Regs_OSORA@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

OGC is still working on this review and should be able to provide comments next week. Please check in early next week if you want a more specific update.

Caroline L. Farrell

Attorney

Office of the General Counsel, CMS Division

United States Department of Health and Human Services

(202) 708 - 9735

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From: CMS Coordination_Regs_OSORA

Sent: Friday, November 2, 2018 2:35 PM

To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>;

Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: FW: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

Note to OGC: Clearance for CMS-2413-F was due on Tuesday, October 30, 2018. We are still pending clearance/comments from OGC. Please provide us with an update as soon as possible.

Thanks

From: CMS Coordination_Regs_OSORA

Sent: Wednesday, October 31, 2018 9:53 AM

To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; CMS OLClearances <OLClearances@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

Good Morning,

This is a friendly reminder that the clearance for CMS-2413-F are now overdue. Clearances were due October 30, 2018. Thank you.

From: CMS Coordination_Regs_OSORA

Sent: Tuesday, October 23, 2018 5:06 PM

To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; CMS OLClearances <OLClearances@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA)

<Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

CMS-2413-F: Medicaid Program; Reassignment of Medicaid Provider Claims

Clearance is requested by 5 p.m., Tuesday, October 30, 2018.

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(b)(5)

If you have any questions regarding submission of clearances and comments, you may contact Cynthia Lambert-Lawson (x6-1366). Please call **Chris Thompson (X6-4044) for policy related questions.**

This final rule is scheduled for publication on November 30, 2018. Therefore, it is important that we receive all clearances timely. Thank you, in advance, for your prompt response.

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Brooks, Gaysha M. \(CMS/OSORA\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#); [Brewer, Annette M. \(CMS/OSORA\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Cc: [Lafferty, Tiffany R. \(CMS/OSORA\)](#); [Hubbard, Lisa A. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#)
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Date: Monday, December 3, 2018 11:17:00 AM

Hi Gaysha,

Revisions will be sent to you all by COB today.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Monday, December 3, 2018 11:16 AM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning,

We are following up on the status of CMS-2413-F. Please let us know when revisions are expected.

Thanks

From: Boston, Beverly A. (CMS/CMCS)
Sent: Friday, November 30, 2018 4:39 PM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Gaysha and Tiffany,

Chris will respond on the status, but in the interim, can you tell me what is new December publication date we're working toward? I need to update other trackers with this information.

Thanks

Beverly

From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Friday, November 30, 2018 1:45 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Chris,

Please provide us with an update for CMS-2413-F.

Thanks

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, November 27, 2018 4:43 PM
To: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Annette,

We are hoping to have the legal issues resolved and the revisions wrapped up by the end of the week at the latest.

Thank you,


Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Brewer, Annette M. (CMS/OSORA)
Sent: Tuesday, November 27, 2018 7:29 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good morning,
Any updates on the timing of the revisions?

Annette M. Brewer 

 410-786-6580 / (b)(6) **ADS on Mondays**

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, November 21, 2018 8:15 AM
To: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning Cynthia,

I am attaching a note that OGC sent to OSORA yesterday. We are current working through some significant legal issues and while we initially anticipated putting the rule back into clearance today, we are now hoping to put it back into clearance early next week.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Lambert-Lawson, Cynthia (CMS/OSORA)
Sent: Wednesday, November 21, 2018 7:29 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning Chris,
To update management, what is the ETA in receiving the revised draft for CMS-2413-F ?

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, November 19, 2018 12:42 PM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Gaysha,

Thank you and yes were on still on schedule with regard to 11/21 submission date.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Monday, November 19, 2018 11:45 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

(b)(5)

Are you still on schedule to send the revisions on 11/21.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, November 19, 2018 11:40 AM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Gaysha,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Tuesday, November 13, 2018 10:11 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis,

Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>

Cc: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning,

Please provide us with an update on when the revised draft will be sent.

Thanks

From: Brooks, Gaysha M. (CMS/OSORA)

Sent: Friday, November 9, 2018 11:44 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>

Cc: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Chris,

Now that CMS clearance is complete, please let us know when the revised draft will be sent.

Thanks

From: Farrell, Caroline (HHS/OGC)

Sent: Friday, November 9, 2018 11:17 AM

To: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good morning,

Please see attached for OGC's comment on the draft Medicaid Provider Payment Reassignment NPRM.

Please let us know if you have questions and whether you would like to have a call to discuss our comments.

Thank you,

Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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From: Brewer, Annette M. (CMS/OSORA)
Sent: Tuesday, November 6, 2018 11:18 AM
To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>
Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Importance: High

Hi Caroline,
Any updates on when we can expect OGC comments? With the rule scheduled for publication this month, we really need to revise the rule based on CMS comments and move to HHS asap. Any help would be appreciated.
Thanks,

Annette M. Brewer 

 410-786-6580 / 443-934-2006 | **ADS on Mondays**

From: Farrell, Caroline (HHS/OGC)

Sent: Friday, November 2, 2018 3:26 PM

To: CMS Coordination_Regs_OSORA <Coordination_Regs_OSORA@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

OGC is still working on this review and should be able to provide comments next week. Please check in early next week if you want a more specific update.

Caroline L. Farrell

Attorney

Office of the General Counsel, CMS Division

United States Department of Health and Human Services

(202) 708 - 9735

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From: CMS Coordination_Regs_OSORA

Sent: Friday, November 2, 2018 2:35 PM

To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: FW: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

Note to OGC: Clearance for CMS-2413-F was due on Tuesday, October 30, 2018. We are still pending clearance/comments from OGC. Please provide us with an update as soon as possible.

Thanks

From: CMS Coordination_Regs_OSORA

Sent: Wednesday, October 31, 2018 9:53 AM

To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; CMS OLClearances <OLClearances@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

Good Morning,

This is a friendly reminder that the clearance for CMS-2413-F are now overdue. Clearances were due October 30, 2018. Thank you.

From: CMS Coordination_Regs_OSORA

Sent: Tuesday, October 23, 2018 5:06 PM

To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; CMS OLClearances <OLClearances@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

CMS-2413-F: Medicaid Program; Reassignment of Medicaid Provider Claims

Clearance is requested by 5 p.m., Tuesday, October 30, 2018.

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(b)(5)

If you have any questions regarding submission of clearances and comments, you may contact Cynthia Lambert-Lawson **(x6-1366)**. Please call **Chris Thompson (X6-4044)** for policy related questions.

This final rule is scheduled for publication on November 30, 2018. Therefore, it is important that we receive all clearances timely. Thank you, in advance, for your prompt response.

From: [Brooks, Gaysha M. \(CMS/OSORA\)](#)
To: [Boston, Beverly A. \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#); [Brewer, Annette M. \(CMS/OSORA\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Cc: [Lafferty, Tiffany R. \(CMS/OSORA\)](#); [Hubbard, Lisa A. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#)
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Date: Monday, December 3, 2018 11:16:16 AM

Good Morning,

We are following up on the status of CMS-2413-F. Please let us know when revisions are expected.

Thanks

From: Boston, Beverly A. (CMS/CMCS)
Sent: Friday, November 30, 2018 4:39 PM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Gaysha and Tiffany,

Chris will respond on the status, but in the interim, can you tell me what is new December publication date we're working toward? I need to update other trackers with this information.

Thanks

Beverly

From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Friday, November 30, 2018 1:45 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Chris,

Please provide us with an update for CMS-2413-F.

Thanks

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, November 27, 2018 4:43 PM
To: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Annette,

We are hoping to have the legal issues resolved and the revisions wrapped up by the end of the week at the latest.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Brewer, Annette M. (CMS/OSORA)
Sent: Tuesday, November 27, 2018 7:29 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)


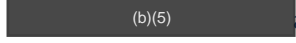
Good morning,
Any updates on the timing of the revisions?

Annette M. Brewer 

 410-786-6580 /  **ADS on Mondays**

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, November 21, 2018 8:15 AM
To: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning Cynthia,

I am attaching a note that OGC sent to OSORA yesterday.  (b)(5)
 (b)(5) and while we initially anticipated putting the rule back into clearance today, we are now hoping to put it back into clearance early next week.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile:  (b)(6)
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From: Lambert-Lawson, Cynthia (CMS/OSORA)
Sent: Wednesday, November 21, 2018 7:29 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lafferty, Tiffany R.

(CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA)
<Lisa.Hubbard@cms.hhs.gov>

Subject: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning Chris,

To update management, what is the ETA in receiving the revised draft for CMS-2413-F ?

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, November 19, 2018 12:42 PM

To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Gaysha,

Thank you and yes were on still on schedule with regard to 11/21 submission date.

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

Mobile: (b)(6)

Fax: (410) 786-8533

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From: Brooks, Gaysha M. (CMS/OSORA)

Sent: Monday, November 19, 2018 11:45 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

(b)(5)

Are you still on schedule to send the revisions on 11/21.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, November 19, 2018 11:40 AM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Gaysha,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Tuesday, November 13, 2018 10:11 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Cc: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning,

Please provide us with an update on when the revised draft will be sent.

Thanks

From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Friday, November 9, 2018 11:44 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Cc: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Chris,

Now that CMS clearance is complete, please let us know when the revised draft will be sent.

Thanks

From: Farrell, Caroline (HHS/OGC)
Sent: Friday, November 9, 2018 11:17 AM

To: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>
Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good morning,

Please see attached for OGC's comment on the draft Medicaid Provider Payment Reassignment NPRM.

Please let us know if you have questions and whether you would like to have a call to discuss our comments.

Thank you,

Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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From: Brewer, Annette M. (CMS/OSORA)
Sent: Tuesday, November 6, 2018 11:18 AM
To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>
Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

Hi Caroline,

Any updates on when we can expect OGC comments? With the rule scheduled for publication this month, we really need to revise the rule based on CMS comments and move to HHS asap. Any help would be appreciated.

Thanks,

Annette M. Brewer 



410-786-6580

(b)(6)

ADS on Mondays

From: Farrell, Caroline (HHS/OGC)

Sent: Friday, November 2, 2018 3:26 PM

To: CMS Coordination_Regs_OSORA <Coordination_Regs_OSORA@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

OGC is still working on this review and should be able to provide comments next week. Please check in early next week if you want a more specific update.

Caroline L. Farrell

Attorney

Office of the General Counsel, CMS Division

United States Department of Health and Human Services

(202) 708 - 9735

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From: CMS Coordination_Regs_OSORA

Sent: Friday, November 2, 2018 2:35 PM

To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: FW: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

Note to OGC: Clearance for CMS-2413-F was due on Tuesday, October 30, 2018. We are still pending clearance/comments from OGC. Please provide us with an update as soon as possible.

Thanks

From: CMS Coordination_Regs_OSORA

Sent: Wednesday, October 31, 2018 9:53 AM

To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; CMS OLClearances <OLClearances@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

Good Morning,

This is a friendly reminder that the clearance for CMS-2413-F are now overdue. Clearances were due October 30, 2018. Thank you.

From: CMS Coordination_Regs_OSORA

Sent: Tuesday, October 23, 2018 5:06 PM

To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; CMS OLClearances <OLClearances@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC)

<Caroline.Farrell@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

CMS-2413-F: Medicaid Program; Reassignment of Medicaid Provider Claims

Clearance is requested by 5 p.m., Tuesday, October 30, 2018.

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(b)(5)

If you have any questions regarding submission of clearances and comments, you may contact Cynthia Lambert-Lawson (x6-1366). Please call Chris Thompson (X6-4044) for policy related questions.

This final rule is scheduled for publication on November 30, 2018. Therefore, it is important that we receive all clearances timely. Thank you, in advance, for your prompt response.

From: [Boston, Beverly A. \(CMS/CMCS\)](#)
To: [Lafferty, Tiffany R. \(CMS/OSORA\)](#); [Brooks, Gaysha M. \(CMS/OSORA\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#); [Brewer, Annette M. \(CMS/OSORA\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Cc: [Hubbard, Lisa A. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#)
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Date: Friday, November 30, 2018 5:01:33 PM

Okay. Thanks!

Beverly

From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Friday, November 30, 2018 4:41 PM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Beverly, We're just tracking December TBD for now.

From: Boston, Beverly A. (CMS/CMCS)
Sent: Friday, November 30, 2018 4:39 PM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Gaysha and Tiffany,

Chris will respond on the status, but in the interim, can you tell me what is new December publication date we're working toward? I need to update other trackers with this information.

Thanks

Beverly

From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Friday, November 30, 2018 1:45 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brewer,

Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>

Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Chris,

Please provide us with an update for CMS-2413-F.

Thanks

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Tuesday, November 27, 2018 4:43 PM

To: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>

Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Annette,

We are hoping to have the legal issues resolved and the revisions wrapped up by the end of the week at the latest.

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

Mobile: (b)(6)

Fax: (410) 786-8533


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From: Brewer, Annette M. (CMS/OSORA)
Sent: Tuesday, November 27, 2018 7:29 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good morning,
Any updates on the timing of the revisions?

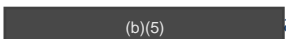
Annette M. Brewer 

 410-786-6580 /  (b)(6) **ADS on Mondays**

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, November 21, 2018 8:15 AM
To: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning Cynthia,

I am attaching a note that OGC sent to OSORA yesterday.  (b)(5)

 (b)(5) and while we initially anticipated putting the rule back into clearance today, we are now hoping to put it back into clearance early next week.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile:  (b)(6)

Fax: (410) 786-8533

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From: Lambert-Lawson, Cynthia (CMS/OSORA)
Sent: Wednesday, November 21, 2018 7:29 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning Chris,
To update management, what is the ETA in receiving the revised draft for CMS-2413-F ?

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, November 19, 2018 12:42 PM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Gaysha,

Thank you and yes were on still on schedule with regard to 11/21 submission date.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

Mobile: (b)(6)

Fax: (410) 786-8533

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From: Brooks, Gaysha M. (CMS/OSORA)

Sent: Monday, November 19, 2018 11:45 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

(b)(5)

Are you still on schedule to send the revisions on 11/21.

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, November 19, 2018 11:40 AM

To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Gaysha,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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Fax: (410) 786-8533

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From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Tuesday, November 13, 2018 10:11 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Cc: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning,

Please provide us with an update on when the revised draft will be sent.

Thanks

From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Friday, November 9, 2018 11:44 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Cc: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer,

Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Chris,

Now that CMS clearance is complete, please let us know when the revised draft will be sent.

Thanks

From: Farrell, Caroline (HHS/OGC)
Sent: Friday, November 9, 2018 11:17 AM
To: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>
Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good morning,

Please see attached for OGC's comment on the draft Medicaid Provider Payment Reassignment NPRM.

Please let us know if you have questions and whether you would like to have a call to discuss our comments.

Thank you,

Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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From: Brewer, Annette M. (CMS/OSORA)
Sent: Tuesday, November 6, 2018 11:18 AM
To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>
Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Importance: High

Hi Caroline,
Any updates on when we can expect OGC comments? With the rule scheduled for publication this month, we really need to revise the rule based on CMS comments and move to HHS asap. Any help would be appreciated.
Thanks,

Annette M. Brewer 



410-786-6580

(b)(6)

ADS on Mondays

From: Farrell, Caroline (HHS/OGC)
Sent: Friday, November 2, 2018 3:26 PM
To: CMS Coordination_Regs_OSORA <Coordination_Regs_OSORA@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

OGC is still working on this review and should be able to provide comments next week. Please check in early next week if you want a more specific update.

Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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From: CMS Coordination_Regs_OSORA

Sent: Friday, November 2, 2018 2:35 PM

To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: FW: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

Note to OGC: Clearance for CMS-2413-F was due on Tuesday, October 30, 2018. We are still pending clearance/comments from OGC. Please provide us with an update as soon as possible.

Thanks

From: CMS Coordination_Regs_OSORA

Sent: Wednesday, October 31, 2018 9:53 AM

To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; CMS OLClearances <OLClearances@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

Good Morning,

This is a friendly reminder that the clearance for CMS-2413-F are now overdue. Clearances were due October 30, 2018. Thank you.

From: CMS Coordination_Regs_OSORA

Sent: Tuesday, October 23, 2018 5:06 PM

To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; CMS OLClearances <OLClearances@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

CMS-2413-F: Medicaid Program; Reassignment of Medicaid Provider Claims

Clearance is requested by 5 p.m., Tuesday, October 30, 2018.

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(b)(5)

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If you have any questions regarding submission of clearances and comments, you may contact Cynthia Lambert-Lawson (x6-1366). Please call Chris Thompson (X6-4044) for policy related questions.

This final rule is scheduled for publication on November 30, 2018. Therefore, it is important that we receive all clearances timely. Thank you, in advance, for your prompt response.

From: [Lafferty, Tiffany R. \(CMS/OSORA\)](#)
To: [Boston, Beverly A. \(CMS/CMCS\)](#); [Brooks, Gaysha M. \(CMS/OSORA\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#); [Brewer, Annette M. \(CMS/OSORA\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Cc: [Hubbard, Lisa A. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#)
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Date: Friday, November 30, 2018 4:40:34 PM

Hi Beverly, We're just tracking December TBD for now.

From: Boston, Beverly A. (CMS/CMCS)
Sent: Friday, November 30, 2018 4:39 PM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Gaysha and Tiffany,

Chris will respond on the status, but in the interim, can you tell me what is new December publication date we're working toward? I need to update other trackers with this information.

Thanks

Beverly

From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Friday, November 30, 2018 1:45 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Chris,

Please provide us with an update for CMS-2413-F.

Thanks

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, November 27, 2018 4:43 PM

To: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Annette,

We are hoping to have the legal issues resolved and the revisions wrapped up by the end of the week at the latest.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Brewer, Annette M. (CMS/OSORA)
Sent: Tuesday, November 27, 2018 7:29 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good morning,
Any updates on the timing of the revisions?

Annette M. Brewer 



410-786-6580 /

(b)(6)

ADS on Mondays

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Wednesday, November 21, 2018 8:15 AM

To: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>

Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning Cynthia,

I am attaching a note that OGC sent to OSORA yesterday.

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and while we initially anticipated putting the rule back into clearance today, we are now hoping to put it back into clearance early next week.

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

Mobile: (b)(6)

Fax: (410) 786-8533

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From: Lambert-Lawson, Cynthia (CMS/OSORA)

Sent: Wednesday, November 21, 2018 7:29 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>

Subject: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning Chris,

To update management, what is the ETA in receiving the revised draft for CMS-2413-F ?

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, November 19, 2018 12:42 PM

To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Gaysha,

Thank you and yes were on still on schedule with regard to 11/21 submission date.

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

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From: Brooks, Gaysha M. (CMS/OSORA)

Sent: Monday, November 19, 2018 11:45 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>;

Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

(b)(5)

Are you still on schedule to send the revisions on 11/21.

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, November 19, 2018 11:40 AM

To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Gaysha,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Brooks, Gaysha M. (CMS/OSORA)

Sent: Tuesday, November 13, 2018 10:11 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>

Cc: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning,

Please provide us with an update on when the revised draft will be sent.

Thanks

From: Brooks, Gaysha M. (CMS/OSORA)

Sent: Friday, November 9, 2018 11:44 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>

Cc: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Chris,

Now that CMS clearance is complete, please let us know when the revised draft will be sent.

Thanks

From: Farrell, Caroline (HHS/OGC)

Sent: Friday, November 9, 2018 11:17 AM

To: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>;

Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good morning,

Please see attached for OGC's comment on the draft Medicaid Provider Payment Reassignment NPRM.

Please let us know if you have questions and whether you would like to have a call to discuss our comments.

Thank you,

Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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From: Brewer, Annette M. (CMS/OSORA)

Sent: Tuesday, November 6, 2018 11:18 AM

To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

Hi Caroline,

Any updates on when we can expect OGC comments? With the rule scheduled for publication

this month, we really need to revise the rule based on CMS comments and move to HHS asap. Any help would be appreciated.

Thanks,

Annette M. Brewer 



410-786-6580 /

(b)(6)

ADS on Mondays

From: Farrell, Caroline (HHS/OGC)

Sent: Friday, November 2, 2018 3:26 PM

To: CMS Coordination_Regs_OSORA <Coordination_Regs_OSORA@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

OGC is still working on this review and should be able to provide comments next week. Please check in early next week if you want a more specific update.

Caroline L. Farrell

Attorney

Office of the General Counsel, CMS Division

United States Department of Health and Human Services

(202) 708 - 9735

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From: CMS Coordination_Regs_OSORA

Sent: Friday, November 2, 2018 2:35 PM

To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: FW: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program;

Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

Note to OGC: Clearance for CMS-2413-F was due on Tuesday, October 30, 2018. We are still pending clearance/comments from OGC. Please provide us with an update as soon as possible.

Thanks

From: CMS Coordination_Regs_OSORA

Sent: Wednesday, October 31, 2018 9:53 AM

To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; CMS OLClearances <OLClearances@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

Good Morning,

This is a friendly reminder that the clearance for CMS-2413-F are now overdue. Clearances were due October 30, 2018. Thank you.

From: CMS Coordination_Regs_OSORA

Sent: Tuesday, October 23, 2018 5:06 PM

To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; CMS OLClearances <OLClearances@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

CMS-2413-F: Medicaid Program; Reassignment of Medicaid Provider Claims

Clearance is requested by 5 p.m., Tuesday, October 30, 2018.

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(b)(5)

If you have any questions regarding submission of clearances and comments, you may contact Cynthia Lambert-Lawson (x6-1366). Please call Chris Thompson (X6-4044) for policy related questions.

This final rule is scheduled for publication on November 30, 2018. Therefore, it is important that we receive all clearances timely. Thank you, in advance, for your prompt response.

From: [Boston, Beverly A. \(CMS/CMCS\)](#)
To: [Brooks, Gaysha M. \(CMS/OSORA\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#); [Brewer, Annette M. \(CMS/OSORA\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Cc: [Lafferty, Tiffany R. \(CMS/OSORA\)](#); [Hubbard, Lisa A. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#)
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Date: Friday, November 30, 2018 4:38:43 PM

Hi Gaysha and Tiffany,

Chris will respond on the status, but in the interim, can you tell me what is new December publication date we're working toward? I need to update other trackers with this information.

Thanks

Beverly

From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Friday, November 30, 2018 1:45 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Chris,

Please provide us with an update for CMS-2413-F.

Thanks

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, November 27, 2018 4:43 PM
To: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Annette,

We are hoping to have the legal issues resolved and the revisions wrapped up by the end of the week at the latest.

Thank you,


Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Brewer, Annette M. (CMS/OSORA)
Sent: Tuesday, November 27, 2018 7:29 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good morning,
Any updates on the timing of the revisions?

Annette M. Brewer 

 410-786-6580 / (b)(6) **ADS on Mondays**

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, November 21, 2018 8:15 AM
To: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning Cynthia,

I am attaching a note that OGC sent to OSORA yesterday.

(b)(5)

(b)(5) and while we initially anticipated putting the rule back into clearance today, we are now hoping to put it back into clearance early next week.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Lambert-Lawson, Cynthia (CMS/OSORA)
Sent: Wednesday, November 21, 2018 7:29 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning Chris,

To update management, what is the ETA in receiving the revised draft for CMS-2413-F ?

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, November 19, 2018 12:42 PM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA)

<Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program;
Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Gaysha,

Thank you and yes were on still on schedule with regard to 11/21 submission date.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Brooks, Gaysha M. (CMS/OSORA)

Sent: Monday, November 19, 2018 11:45 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program;
Reassignment of Medicaid Provider Claims (CMS-2413-F)

(b)(5)

Are you still on schedule to send the revisions on 11/21.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, November 19, 2018 11:40 AM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Gaysha,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Tuesday, November 13, 2018 10:11 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Cc: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning,

Please provide us with an update on when the revised draft will be sent.

Thanks

From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Friday, November 9, 2018 11:44 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Cc: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Chris,

Now that CMS clearance is complete, please let us know when the revised draft will be sent.

Thanks

From: Farrell, Caroline (HHS/OGC)
Sent: Friday, November 9, 2018 11:17 AM
To: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>
Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good morning,

Please see attached for OGC's comment on the draft Medicaid Provider Payment Reassignment NPRM.

Please let us know if you have questions and whether you would like to have a call to discuss our comments.

Thank you,

Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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From: Brewer, Annette M. (CMS/OSORA)
Sent: Tuesday, November 6, 2018 11:18 AM
To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>
Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Importance: High

Hi Caroline,
Any updates on when we can expect OGC comments? With the rule scheduled for publication this month, we really need to revise the rule based on CMS comments and move to HHS asap. Any help would be appreciated.
Thanks,

Annette M. Brewer 



410-786-6580 /

(b)(6)

ADS on Mondays

From: Farrell, Caroline (HHS/OGC)
Sent: Friday, November 2, 2018 3:26 PM
To: CMS Coordination_Regs_OSORA <Coordination_Regs_OSORA@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan,

Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

OGC is still working on this review and should be able to provide comments next week. Please check in early next week if you want a more specific update.

Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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From: CMS Coordination_Regs_OSORA
Sent: Friday, November 2, 2018 2:35 PM
To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Subject: FW: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Importance: High

Note to OGC: Clearance for CMS-2413-F was due on Tuesday, October 30, 2018. We are still pending clearance/comments from OGC. Please provide us with an update as soon as possible.

Thanks

From: CMS Coordination_Regs_OSORA
Sent: Wednesday, October 31, 2018 9:53 AM
To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; CMS OLClearances <OLClearances@cms.hhs.gov>;

Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

Good Morning,

This is a friendly reminder that the clearance for CMS-2413-F are now overdue. Clearances were due October 30, 2018. Thank you.

From: CMS Coordination_Regs_OSORA

Sent: Tuesday, October 23, 2018 5:06 PM

To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; CMS OLClearances <OLClearances@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

CMS-2413-F: Medicaid Program; Reassignment of Medicaid Provider Claims

Clearance is requested by 5 p.m., Tuesday, October 30, 2018.

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(b)(5)

(b)(5)

If you have any questions regarding submission of clearances and comments, you may contact Cynthia Lambert-Lawson (x6-1366). Please call Chris Thompson (X6-4044) for policy related questions.

This final rule is scheduled for publication on November 30, 2018. Therefore, it is important that we receive all clearances timely. Thank you, in advance, for your prompt response.

From: [Brooks, Gaysha M. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Brewer, Annette M. \(CMS/OSORA\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Cc: [Lafferty, Tiffany R. \(CMS/OSORA\)](#); [Hubbard, Lisa A. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#)
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Date: Friday, November 30, 2018 1:45:12 PM

Hi Chris,

Please provide us with an update for CMS-2413-F.

Thanks

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, November 27, 2018 4:43 PM
To: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Annette,

We are hoping to have the legal issues resolved and the revisions wrapped up by the end of the week at the latest.

Thank you,


Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Brewer, Annette M. (CMS/OSORA)
Sent: Tuesday, November 27, 2018 7:29 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

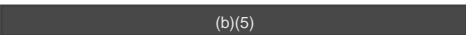
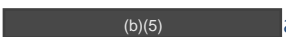
Good morning,
Any updates on the timing of the revisions?

Annette M. Brewer 

 410-786-6580 /  (b)(6) **ADS on Mondays**

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, November 21, 2018 8:15 AM
To: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning Cynthia,

I am attaching a note that OGC sent to OSORA yesterday.  (b)(5)
 (b)(5) and while we initially anticipated putting the rule back into clearance today, we are now hoping to put it back into clearance early next week.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile:  (b)(6)
Fax: (410) 786-8533

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From: Lambert-Lawson, Cynthia (CMS/OSORA)
Sent: Wednesday, November 21, 2018 7:29 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning Chris,
To update management, what is the ETA in receiving the revised draft for CMS-2413-F ?

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, November 19, 2018 12:42 PM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Gaysha,

Thank you and yes were on still on schedule with regard to 11/21 submission date.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)

Fax: (410) 786-8533

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From: Brooks, Gaysha M. (CMS/OSORA)

Sent: Monday, November 19, 2018 11:45 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

(b)(5)

Are you still on schedule to send the revisions on 11/21.

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, November 19, 2018 11:40 AM

To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Gaysha,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Tuesday, November 13, 2018 10:11 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Cc: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good Morning,

Please provide us with an update on when the revised draft will be sent.

Thanks

From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Friday, November 9, 2018 11:44 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Cc: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program;

Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Chris,

Now that CMS clearance is complete, please let us know when the revised draft will be sent.

Thanks

From: Farrell, Caroline (HHS/OGC)
Sent: Friday, November 9, 2018 11:17 AM
To: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>
Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Good morning,

Please see attached for OGC's comment on the draft Medicaid Provider Payment Reassignment NPRM.

Please let us know if you have questions and whether you would like to have a call to discuss our comments.

Thank you,

Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735


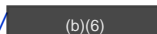
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From: Brewer, Annette M. (CMS/OSORA)
Sent: Tuesday, November 6, 2018 11:18 AM

To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>
Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Importance: High

Hi Caroline,
Any updates on when we can expect OGC comments? With the rule scheduled for publication this month, we really need to revise the rule based on CMS comments and move to HHS asap. Any help would be appreciated.
Thanks,

Annette M. Brewer 

 410-786-6580 /  (b)(6) **ADS on Mondays**

From: Farrell, Caroline (HHS/OGC)
Sent: Friday, November 2, 2018 3:26 PM
To: CMS Coordination_Regs_OSORA <Coordination_Regs_OSORA@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Subject: RE: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

OGC is still working on this review and should be able to provide comments next week. Please check in early next week if you want a more specific update.

Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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disseminate, or otherwise use the information. Also, please notify the sender that you have received this communication in error. Your receipt of this message is not intended to waive any applicable privilege.

From: CMS Coordination_Regs_OSORA
Sent: Friday, November 2, 2018 2:35 PM
To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Subject: FW: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Importance: High

Note to OGC: Clearance for CMS-2413-F was due on Tuesday, October 30, 2018. We are still pending clearance/comments from OGC. Please provide us with an update as soon as possible.

Thanks

From: CMS Coordination_Regs_OSORA
Sent: Wednesday, October 31, 2018 9:53 AM
To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; CMS OLClearances <OLClearances@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Subject: Reminder: Clearances are overdue!! Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Importance: High

Good Morning,

This is a friendly reminder that the clearance for CMS-2413-F are now overdue. Clearances were due October 30, 2018. Thank you.

From: CMS Coordination_Regs_OSORA

Sent: Tuesday, October 23, 2018 5:06 PM

To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; CMS OLClearances <OLClearances@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

CMS-2413-F: Medicaid Program; Reassignment of Medicaid Provider Claims

Clearance is requested by 5 p.m., Tuesday, October 30, 2018.

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(b)(5)

If you have any questions regarding submission of clearances and comments, you may contact

Cynthia Lambert-Lawson (x6-1366). Please call Chris Thompson (X6-4044) for policy related questions.

This final rule is scheduled for publication on November 30, 2018. Therefore, it is important that we receive all clearances timely. Thank you, in advance, for your prompt response.

From: [Mack, Rosa \(CMS/CMCS\)](#)
To: [Joy-Bush, Keya A. \(CMS/OC\)](#); [Barco, Evell J. \(CMS/OSORA\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#); [Bryman, Mitch \(CMS/OSORA\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#); [Farrell, Caroline \(HHS/OGC\)](#); [Laib, Eric C. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#); [Popp, Dawn \(HHS/OGC\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Cc: [Ceballos, Kelly L. \(CMS/OC\)](#); [Monroe, Johnathan \(CMS/OC\)](#); [Venson, Shelby \(CMS/OC\)](#)
Subject: RE: Medicaid Provider Payment Reassignment NPRM CMS-2413-P
Date: Monday, July 2, 2018 4:59:22 PM

Hi. Yes, we're working on finalizing the rollout materials so that we can begin comms clearance.

From: Joy-Bush, Keya A. (CMS/OC)
Sent: Monday, July 2, 2018 4:33 PM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>
Cc: Ceballos, Kelly L. (CMS/OC) <Kelly.Ceballos@cms.hhs.gov>; Monroe, Johnathan (CMS/OC) <Johnathan.Monroe@cms.hhs.gov>; Venson, Shelby (CMS/OC) <Shelby.Venson@cms.hhs.gov>
Subject: RE: Medicaid Provider Payment Reassignment NPRM CMS-2413-P

Hi Evell,

Thanks for the rule update rollout materials are pending with CMCS.

(b)(5)

From: Barco, Evell J. (CMS/OSORA)
Sent: Monday, July 2, 2018 4:30 PM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Joy-Bush, Keya A.

(CMS/OC) <keya.joy-bush@cms.hhs.gov>

Cc: Ceballos, Kelly L. (CMS/OC) <Kelly.Ceballos@cms.hhs.gov>

Subject: Medicaid Provider Payment Reassignment NPRM CMS-2413-P

Hi Evell,

OMB has concluded review. What is the status of rollout please?

From: [Gifford, Deidre S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: Medicaid Provider Payment Reassignment NPRM CMS-2413-P
Date: Tuesday, July 3, 2018 11:37:08 AM

Thanks Chris

Deidre S. Gifford, MD, MPH
Deputy Director
Center for Medicaid and CHIP Services (CMCS)
7500 Security Blvd. Baltimore, MD 21244
Phone: 410-786-3665
deidre.gifford@cms.hhs.gov

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From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, July 3, 2018 11:24 AM
To: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>
Cc: Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: FW: Medicaid Provider Payment Reassignment NPRM CMS-2413-P

Hi Tim,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244

Phone: (410)786-4044

Mobile: (b)(6)

Fax: (410) 786-8533

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From: Boston, Beverly A. (CMS/CMCS)

Sent: Tuesday, July 3, 2018 10:41 AM

To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Cc: Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>

Subject: RE: Medicaid Provider Payment Reassignment NPRM CMS-2413-P

Hello,

(b)(5)

Beverly

From: Barco, Evell J. (CMS/OSORA)

Sent: Tuesday, July 3, 2018 10:25 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Cc: Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>

Subject: RE: Medicaid Provider Payment Reassignment NPRM CMS-2413-P

(b)(5)

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Tuesday, July 3, 2018 10:22 AM

To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>

Cc: Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>

Subject: RE: Medicaid Provider Payment Reassignment NPRM CMS-2413-P

Hi Evell,

We are getting pinged by OCD with regard to the status of the proposed rule.
I just wanted to confirm it has been cleared by OMB and the only thing we are waiting for is the finalization of the rollout materials?

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Barco, Evell J. (CMS/OSORA)
Sent: Monday, July 2, 2018 6:45 PM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Cc: Joy-Bush, Keya A. (CMS/OC) <keya.joy-bush@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Ceballos, Kelly L. (CMS/OC) <Kelly.Ceballos@cms.hhs.gov>; Monroe, Johnathan (CMS/OC) <Johnathan.Monroe@cms.hhs.gov>; Venson, Shelby (CMS/OC) <Shelby.Venson@cms.hhs.gov>
Subject: Re: Medicaid Provider Payment Reassignment NPRM CMS-2413-P

Any word on what we should target for OFR display? Any idea how long rollout clearance will take?

Sent from my iPhone

On Jul 2, 2018, at 4:47 PM, Boston, Beverly A. (CMS/CMCS)

<Beverly.Boston@cms.hhs.gov> wrote:

Hello,

That's correct, roll-out materials are still being cleared. Rosa/Lela, is there an ETA on when the roll-out materials will complete clearance?

Beverly A. Boston

Special Assistant to the Group Director
Financial Management Group
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
Beverly.Boston@CMS.HHS.Gov
410-786-4186

From: Joy-Bush, Keya A. (CMS/OC)
Sent: Monday, July 2, 2018 4:33 PM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>
Cc: Ceballos, Kelly L. (CMS/OC) <Kelly.Ceballos@cms.hhs.gov>; Monroe, Johnathan (CMS/OC) <Johnathan.Monroe@cms.hhs.gov>; Venson, Shelby (CMS/OC) <Shelby.Venson@cms.hhs.gov>
Subject: RE: Medicaid Provider Payment Reassignment NPRM CMS-2413-P

Hi Evell,

Thanks for the rule update rollout materials are pending with CMCS.

(b)(5)

From: Barco, Evell J. (CMS/OSORA)
Sent: Monday, July 2, 2018 4:30 PM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Joy-Bush, Keya A. (CMS/OC) <keya.joy-bush@cms.hhs.gov>
Cc: Ceballos, Kelly L. (CMS/OC) <Kelly.Ceballos@cms.hhs.gov>
Subject: Medicaid Provider Payment Reassignment NPRM CMS-2413-P

Hi Evell,
OMB has concluded review. What is the status of rollout please?

From: [Boston, Beverly A. \(CMS/CMCS\)](#)
To: [Fan, Kristin A. \(CMS/CMCS\)](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: Need Kristin's Clearance: : HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F
Date: Monday, November 5, 2018 3:54:01 PM

Thanks

Beverly

From: Fan, Kristin A. (CMS/CMCS)
Sent: Monday, November 5, 2018 3:44 PM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: Need Kristin's Clearance: : HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F

Cleared.

From: Boston, Beverly A. (CMS/CMCS)
Sent: Monday, November 5, 2018 2:29 PM
To: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: Need Kristin's Clearance: : HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F

Thanks Chris! Kristin, do you clear the attached to be moved forward to the OCD and onward to HHS?

Beverly

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, November 5, 2018 2:26 PM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>
Subject: RE: DUE MON 11/5: HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F

Hey Beverly,

Attached is a revised briefing paper with two separate appendices that provide more detail on comments received.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Boston, Beverly A. (CMS/CMCS)
Sent: Friday, November 2, 2018 3:55 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>
Subject: RE: DUE MON 11/5: HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F

Hi Chris,

I think the separate document is fine. Evell will let us know if that does not work.

Thanks

Beverly

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Friday, November 2, 2018 3:45 PM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS)

<Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>

Subject: RE: DUE MON 11/5: HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F

Hey Beverly,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Boston, Beverly A. (CMS/CMCS)
Sent: Wednesday, October 31, 2018 11:30 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>
Subject: DUE MON 11/5: HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F

Hello,

Lela forwarded the string to me. See attached HHS Reviewers briefing paper used for the PRR NPRM. Please update for the final rule briefing. Please cc: me when you respond back to OSORA so I have a record of the action and date for the reviewers briefing.

Thanks

Beverly

From: Teal, Lela (CMS/CMCS)

Sent: Wednesday, October 31, 2018 7:39 AM

To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>

Subject: FW: HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F

Please see below

From: Barco, Evell J. (CMS/OSORA)

Sent: Tuesday, October 30, 2018 5:55 PM

To: Harshman, Sara (CMS/CMCS) <Sara.Harshman@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>

Cc: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: HHS Reviewers paper -Reassignment of Medicaid Provider Claims CMS-2413-F

Hello,

Since we have completed OA briefings and the rule has been submitted for CMS review, I am preparing for next steps. When the rule is submitted to HHS for review (date currently uncertain), the HHS reviewers paper should accompany it. Please provide a briefing paper by Monday, Nov 5 to ensure it moves timely.

Please contact me if you have questions. Thanks.

From: [Boston, Beverly A. \(CMS/CMCS\)](#)
To: [Brooks, Gaysha M. \(CMS/OSORA\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#)
Cc: [Teal, Lela \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Brown, Sharon J. \(CMS/CMCS\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#); [Brewer, Annette M. \(CMS/OSORA\)](#)
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P
Date: Wednesday, March 28, 2018 1:27:59 PM

Hi Gaysha,

That's fine. We'll turn the comments around quickly. Our understanding is that the Administrator wanted the NPRM advanced to HHS by Friday which is why we developed the OS briefing memo proactively. We'll be sure to turn comments around expeditiously.

Beverly

From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Wednesday, March 28, 2018 12:53 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P

Please note that CMS clearances are now due on 3/30, but the rule will not go to HHS until all CMS comments have been addressed.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, March 28, 2018 9:49 AM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P

Good Morning Gaysha,

Thank you for the pointer. We will make sure the paper is routed to the appropriate OSORA staff in DC.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
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From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Wednesday, March 28, 2018 9:36 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P

Hi Chris,

The memo should be forwarded through your Front Office to OSORA staff in DC.

Thanks

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, March 27, 2018 4:15 PM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Lawson@cms.hhs.gov>

Subject: RE: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P

Hi Gaysha,

Per the attached e-mail, I understand you all are aware of the fact that the Provider Payment Reassignment NPRM is going into HHS clearance by March 30th. Attached is the Pre-Development Decision Memo to be sent to HHS.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Friday, March 23, 2018 12:25 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P

Hi,

(b)(5)

Thanks,

Gaysha

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Thursday, March 22, 2018 5:39 PM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P

Please see the attached revised draft of CMS-2413-P.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Thursday, March 22, 2018 3:41 PM
To: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
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Subject: RE: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P

Attached is the latest draft of CMS-2413-P. Please see our comments in the document and send back.

Thanks

From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Thursday, March 22, 2018 2:40 PM
To: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Cc: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P

Here is an example:

(b)(5)

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Sent: Thursday, March 22, 2018 2:20 PM
To: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Cc: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: Re: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P

(b)(5)

On Mar 22, 2018, at 2:13 PM, Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov> wrote:

(b)(5)

From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Thursday, March 22, 2018 1:24 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P

(b)(5)

Thanks

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Thursday, March 22, 2018 12:16 PM
To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P

Good Afternoon Annette and Tiffany,

Attached is the Provider Payment Reassignment NPRM. This NPRM has been cleared by the CMCS OCD. I am also attaching the expedited regulation clearance schedule that concludes with the publishing of the proposed rule by 6/22/18. I wanted to confirm this is the most recent iteration of the clearance schedule for this rule?

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
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From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Friday, March 16, 2018 8:08 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment

Good morning, Thanks again for all of your help with gathering the info so quickly for this rule. This will be CMS-2413-P and it's been assigned to Annette Brewer's Division. Once she confirms the OSORA regs analyst, she'll reply to let folks know.

Tiffany

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Thursday, March 15, 2018 4:47 PM
To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment

(b)(5)

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
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From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Thursday, March 15, 2018 4:38 PM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>
Cc: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment

(b)(5)

From: Boston, Beverly A. (CMS/CMCS)
Sent: Thursday, March 15, 2018 4:33 PM
To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>
Cc: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment

Thanks all!

Beverly

From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Thursday, March 15, 2018 4:30 PM
To: Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Cc: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment

Ok, holding until I hear from you.

From: Teal, Lela (CMS/CMCS)
Sent: Thursday, March 15, 2018 4:29 PM
To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Cc: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment

Calder is still reviewing – first time at bat ☺

Lela Teal | Special Assistant | Center for Medicaid and CHIP Services | Centers for Medicare & Medicaid Services | 7500 Security Boulevard, C5-21-15 | Baltimore, MD 21244 | O: 410.786.1064 | iPhone: (b)(6) | F: 410.786.0025 | lela.teal@cms.hhs.gov

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From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Thursday, March 15, 2018 4:28 PM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Cc: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment

Thank you so much! Just copying Lela because I was just talking to her about it. I need to get this over to OMB asap, and then I'll get back to you on the file code and assignment. For publication by December, we would need the draft NLT than the end of May.

From: Boston, Beverly A. (CMS/CMCS)
Sent: Thursday, March 15, 2018 4:16 PM
To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>
Cc: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: New Medicaid NPRM: Provider Payment Reassignment

Hi Tiffany,

Following up on this RID from Lela Teal regarding our new regulation. I wanted to make sure you knew that the lead POC on this rule is Christopher Thompson. Also, please let us know all the details such as who will be Chris's OSORA Regs analyst, what the Reg# and when will OSORA need the draft NPRM from us in order to meet the suggested Dec publication date.

Thanks and look forward to hearing from you.

Beverly

From: Teal, Lela (CMS/CMCS)
Sent: Wednesday, March 14, 2018 9:30 AM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: FW: New Medicaid NPRM

Good Morning;

Would you mind reviewing and letting me know if you have additional comments or concerns?

Thank you,

Lela Teal | Special Assistant | Center for Medicaid and CHIP Services | Centers for Medicare & Medicaid Services | 7500 Security Boulevard, C5-21-15 | Baltimore, MD 21244 | O: 410.786.1064 | iPhone: (b)(6) | F: 410.786.0025 | lela.teal@cms.hhs.gov

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From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Wednesday, March 14, 2018 8:58 AM
To: Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>
Cc: CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>
Subject: New Medicaid NPRM

Good morning Lela,

(b)(5)

(b)(5)

Could you please get this back to me by noon tomorrow? I have to get everything back to them by COB.

Thanks!
Tiffany

Tiffany Lafferty

Technical Advisor

Regulations Development Group

Office of Strategic Operations and Regulatory Affairs

Centers for Medicare & Medicaid Services

☎ 410-786-7548 (Office)

☎ (b)(6) (Cell)

✉ tiffany.lafferty@cms.hhs.gov

From: [Boston, Beverly A. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P
Date: Wednesday, March 28, 2018 10:05:37 AM

Sure!

Beverly

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, March 28, 2018 10:02 AM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P

Thanks Beverly!

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
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Centers for Medicare & Medicaid Services
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Sent: Wednesday, March 28, 2018 9:58 AM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Cc: Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P

I'll get it to Farooq when requested.

Thanks

Beverly

From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Wednesday, March 28, 2018 9:36 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
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Subject: RE: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P

Hi Chris,

The memo should be forwarded through your Front Office to OSORA staff in DC.

Thanks

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, March 27, 2018 4:15 PM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P

Hi Gaysha,

Per the attached e-mail, I understand you all are aware of the fact that the Provider Payment Reassignment NPRM is going into HHS clearance by March 30th. Attached is the Pre-Development Decision Memo to be sent to HHS.

Thank you,

Chris Thompson
Deputy Division Director

Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
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Sent: Friday, March 23, 2018 12:25 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
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Subject: RE: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P

Hi,

I moved the language in regard to what you are seeking comments on from the background section to the provisions of the proposed regulations section. Let me know if you are okay with this. If so, we will send the document to CMS clearance today.

Thanks,
Gaysha

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Thursday, March 22, 2018 5:39 PM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
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Subject: RE: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P

Please see the attached revised draft of CMS-2413-P.

Thank you,

Chris Thompson
Deputy Division Director
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Subject: RE: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P

Attached is the latest draft of CMS-2413-P. Please see our comments in the document and send back.

Thanks

From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Thursday, March 22, 2018 2:40 PM
To: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Cc: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Lambert-Lawson, Cynthia

(CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: RE: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P

Here is an example:

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From: Brooks, Gaysha M. (CMS/OSORA)

Sent: Thursday, March 22, 2018 2:20 PM

To: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>

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Subject: Re: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P

(b)(5)

On Mar 22, 2018, at 2:13 PM, Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov> wrote:

(b)(5)

From: Brooks, Gaysha M. (CMS/OSORA)

Sent: Thursday, March 22, 2018 1:24 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: RE: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P

(b)(5)

(b)(5)

Thanks

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Thursday, March 22, 2018 12:16 PM
To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment-CMS-2413-P

Good Afternoon Annette and Tiffany,

Attached is the Provider Payment Reassignment NPRM. This NPRM has been cleared by the CMCS OCD. I am also attaching the expedited regulation clearance schedule that concludes with the publishing of the proposed rule by 6/22/18. I wanted to confirm this is the most recent iteration of the clearance schedule for this rule?

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Friday, March 16, 2018 8:08 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment

Good morning, Thanks again for all of your help with gathering the info so quickly for this rule. This will be CMS-2413-P and it's been assigned to Annette Brewer's Division. Once she confirms the OSORA regs analyst, she'll reply to let folks know.

Tiffany

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Thursday, March 15, 2018 4:47 PM
To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Thursday, March 15, 2018 4:38 PM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>
Cc: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment

(b)(5)

From: Boston, Beverly A. (CMS/CMCS)
Sent: Thursday, March 15, 2018 4:33 PM
To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>
Cc: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment

Thanks all!

Beverly

From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Thursday, March 15, 2018 4:30 PM
To: Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Cc: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: New Medicaid NPRM: Provider Payment Reassignment

Ok, holding until I hear from you.

From: Teal, Lela (CMS/CMCS)
Sent: Thursday, March 15, 2018 4:29 PM
To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Boston, Beverly

A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>

Cc: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: RE: New Medicaid NPRM: Provider Payment Reassignment

Calder is still reviewing – first time at bat ☺

Lela Teal | Special Assistant | Center for Medicaid and CHIP Services | Centers for Medicare & Medicaid Services | 7500 Security Boulevard, C5-21-15 | Baltimore, MD 21244 | O: 410.786.1064 | iPhone (b)(6) F: 410.786.0025 | lela.teal@cms.hhs.gov

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From: Lafferty, Tiffany R. (CMS/OSORA)

Sent: Thursday, March 15, 2018 4:28 PM

To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>

Cc: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>;

Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>

Subject: RE: New Medicaid NPRM: Provider Payment Reassignment

Thank you so much! Just copying Lela because I was just talking to her about it. I need to get this over to OMB asap, and then I'll get back to you on the file code and assignment. For publication by December, we would need the draft NLT than the end of May.

From: Boston, Beverly A. (CMS/CMCS)

Sent: Thursday, March 15, 2018 4:16 PM

To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>

Cc: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: New Medicaid NPRM: Provider Payment Reassignment

Hi Tiffany,

Following up on this RID from Lela Teal regarding our new regulation. I wanted to make sure you knew that the lead POC on this rule is Christopher Thompson. Also, please let us know all the details such as who will be Chris's OSORA Regs analyst, what the Reg# and when will OSORA need the draft NPRM from us in order to meet the suggested Dec publication date.

Thanks and look forward to hearing from you.

Beverly

From: Teal, Lela (CMS/CMCS)
Sent: Wednesday, March 14, 2018 9:30 AM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: FW: New Medicaid NPRM

Good Morning;

Would you mind reviewing and letting me know if you have additional comments or concerns?

Thank you,

Lela Teal | Special Assistant | Center for Medicaid and CHIP Services | Centers for Medicare & Medicaid Services | 7500 Security Boulevard, C5-21-15 | Baltimore, MD 21244 | O: 410.786.1064 | iPhone (b)(6) | F: 410.786.0025 | lela.teal@cms.hhs.gov

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From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Wednesday, March 14, 2018 8:58 AM
To: Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>
Cc: CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>
Subject: New Medicaid NPRM

Good morning Lela,

(b)(5)

Could you please get this back to me by noon tomorrow? I have to get everything back to them by COB.

Thanks!
Tiffany

Tiffany Lafferty

Technical Advisor

Regulations Development Group

Office of Strategic Operations and Regulatory Affairs

Centers for Medicare & Medicaid Services

☎ 410-786-7548 (Office)

☎ (b)(6) Cell)

✉ tiffany.lafferty@cms.hhs.gov

From: [Barco, Evell J. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: OMB Briefing Paper
Date: Thursday, April 19, 2018 5:21:25 PM

Hi Christopher,

The revised rule is in clearance. Will you now be able to provide the OMB briefing paper by tomorrow?

From: Barco, Evell J. (CMS/OSORA)
Sent: Wednesday, April 18, 2018 1:03 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: OMB Briefing Paper

Hi Christopher,

We shared the HHS paper that you provided but no briefing was necessary. Now that HHS clearance is complete and we plan to send a revised rule back tomorrow I believe, we will also need to send a briefing paper to OMB. Attached is the HHS paper. Please let me know if the briefing paper needs to be updated before we move it to OMB. I look forward to hearing back from you. Feel free to contact me if you have questions.

Thanks.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, April 10, 2018 7:31 AM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: HHS Reviewers Briefing Paper

Good Morning Evell,

Attached is the version of the Reviewer's Briefing Paper that was cleared by the FMG front office.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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Mobile: [REDACTED] (b)(6)

Fax: (410) 786-8533

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From: [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: OMB passback-: Provider Payment Reassignment (-CMS-2413-P)
Date: Thursday, May 31, 2018 1:05:00 PM

Thank you for the update.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Thursday, May 31, 2018 12:53 PM
To: Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Subject: RE: OMB passback-: Provider Payment Reassignment (-CMS-2413-P)

Hi Cynthia,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
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7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Lambert-Lawson, Cynthia (CMS/OSORA)
Sent: Thursday, May 31, 2018 12:32 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Cc: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: FW: OMB passback-: Provider Payment Reassignment (-CMS-2413-P)

Chris,

I do not see any responses to DOJ comments—see DOJ comments below in Evell's email (highlighted).

Also, when can we expect to receive CMCS revisions based on comments from OGC, DOJ and OMB?

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Thursday, May 24, 2018 5:19 PM

To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>

Subject: RE: OMB passback-: Provider Payment Reassignment (-CMS-2413-P)

Hi Evell,

Attached is the passback that incorporates both DOJ's and OMB's edits.

Thank you and have a good holiday weekend,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

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Fax: (410) 786-8533

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From: Barco, Evell J. (CMS/OSORA)

Sent: Wednesday, May 23, 2018 11:09 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>

Cc: Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Khan, Farooq A. (CMS/OSORA) <Farooq.Khan@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Cavanaugh, Alicia A. (CMS/OSORA) <Alicia.Cavanaugh@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>

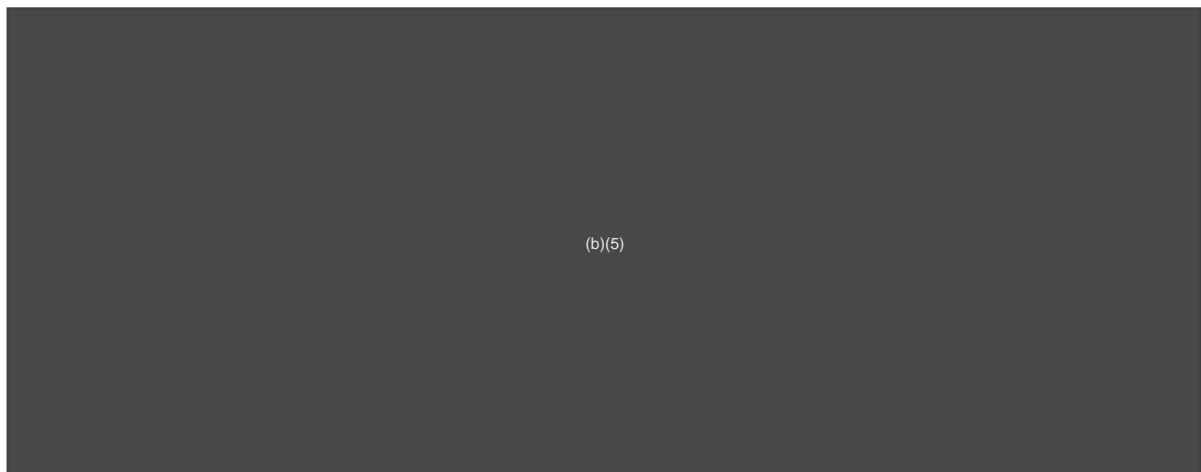
Subject: DOJ Comments: Provider Payment Reassignment (-CMS-2413-P)

Hello all,

DOJ comments on the Medicaid provider payment reassignment rule are below. We should get a full EOP passback this week.

Thanks,

DOJ Comments



Please consider the environment before printing this e-mail.

From: [Fan, Kristin A. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Re: PPR
Date: Monday, November 26, 2018 6:17:50 PM

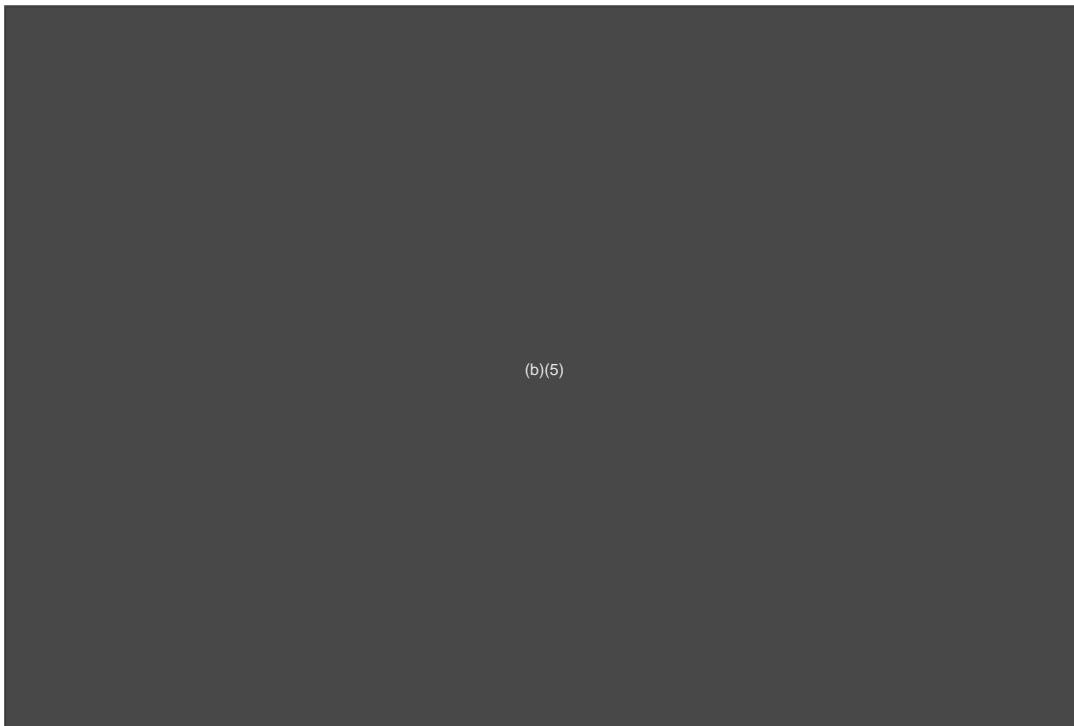
Thanks.

Sent from my iPhone

On Nov 26, 2018, at 5:12 PM, Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov> wrote:

Hey Kristin,

The two issues are as follows:



Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)

Fax: (410) 786-8533

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From: Fan, Kristin A. (CMS/CMCS)

Sent: Monday, November 26, 2018 4:33 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: FW: PPR

just saw this – let me know the update. Thanks.

From: Mayhew, Mary (CMS/OA)

Sent: Monday, November 26, 2018 3:46 PM

To: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>

Cc: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>

Subject: PPR

Kristin,

(b)(5)

Thank you.


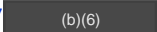
Mary

Mary C. Mayhew
Deputy Administrator, Director
Center for Medicaid & CHIP Services
410-913-6829

From: [Brewer, Annette M. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Lafferty, Tiffany R. \(CMS/OSORA\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#); [Brooks, Gaysha M. \(CMS/OSORA\)](#)
Cc: [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Hubbard, Lisa A. \(CMS/OSORA\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#)
Subject: RE: Provider Reassignment (2413-P) Final Rule
Date: Monday, October 22, 2018 4:43:55 PM

Thanks.

Annette M. Brewer 

 410-786-6580 /  **ADS on Mondays**

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, October 22, 2018 4:42 PM
To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule

Good Afternoon Gaysha and Tiffany,

The attached draft final rule is being submitted for clearance.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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Fax: (410) 786-8533

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From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Friday, October 19, 2018 3:31 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Chris, Just checking in to see if we can still expect your draft today. Thanks!

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, October 16, 2018 12:26 PM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Tiffany,

We are still on track for the 10/19 date.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

From: Boston, Beverly A. (CMS/CMCS)
Sent: Tuesday, October 16, 2018 12:22 PM
To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Thank you and Chris will let you know whether we're on track to meet the 10/19 date to OSORA.

Beverly

From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Tuesday, October 16, 2018 11:16 AM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Correct. OA understands that November will be a challenge, but they want to start there and see what HHS/OMB will agree to once we're ready to share with them for clearance.

From: Boston, Beverly A. (CMS/CMCS)
Sent: Tuesday, October 16, 2018 10:37 AM
To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Tiffany,

So the expedited schedule will be based on OA's November date correct? I know that depends on whether OMB will agree to a shorter review timeframe.

Beverly

From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Tuesday, October 16, 2018 9:28 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Good morning Chris, We don't have a firm schedule, but I do have some timeframes. The latest that I have heard is that the final rule will indicate a January publication target on the upcoming fall Unified Agenda, but OA has asked us to continue to target November TBD. We heard from Calder that we can expect your draft by 10/19. Please let us know if that changes.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, October 15, 2018 10:41 AM
To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Tiffany,

I wanted circle back to you to see if there has been any movement as far as the regulation schedule?

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Tuesday, September 18, 2018 10:45 AM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Beverly, We're pending a response from Brady Brookes in OA on what the target date should be. OMB is pressing for a 90-days review; however, we understand that leadership would like it earlier. Once OA confirms direction for the target, we can develop the schedule.

Tiffany

From: Boston, Beverly A. (CMS/CMCS)
Sent: Tuesday, September 18, 2018 10:17 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Good morning,

Looping Tiffany, wanted to mention that the Administrator requested that we put this item back on this Thursday's Issues agenda although she was briefed on 9/5-- we believe she wants to know the timeframe to publish in final. We meet with our Center Directors tomorrow at

1pm and a new timeline reflecting a 10/31 (or late October) date to OSORA would be helpful.

Thanks

Beverly

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, September 17, 2018 5:11 PM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Gaysha,

We wanted to present a revised timeline to OCD this week. Can the timeline be revised to accommodate a 10/31/18 date to submit the rule to OSORA?

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
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7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: [Farrell, Caroline \(HHS/OGC\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Re: Provider Reassignment Final Rule - Legal Comments
Date: Friday, October 19, 2018 3:39:38 PM

Thank you!!

On: 19 October 2018 12:56,
"Thompson, Christopher C. (CMS/CMCS)" <Christopher.Thompson@cms.hhs.gov> wrote:

Sure, I will try to set up a call for either Monday or Tuesday.

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
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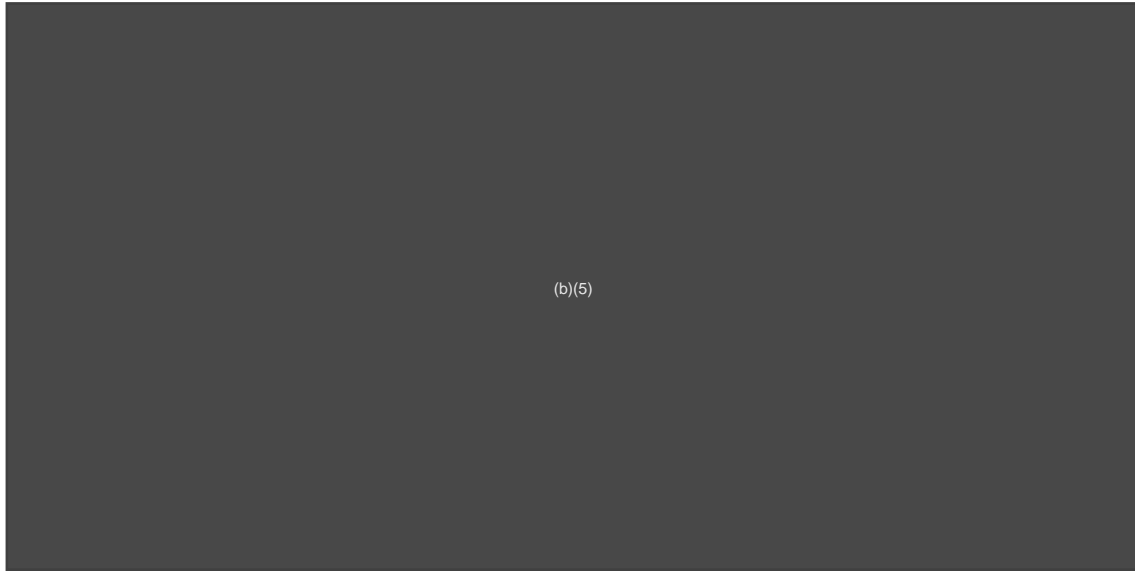
From: Farrell, Caroline (HHS/OGC)
Sent: Friday, October 19, 2018 12:19 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>
Cc: Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>
Subject: Re: Provider Reassignment Final Rule - Legal Comments

Can we talk about this early next week?

On: 19 October 2018 11:18,
"Thompson, Christopher C. (CMS/CMCS)" <Christopher.Thompson@cms.hhs.gov> wrote:

Hey Dawn and Caroline,

I wanted to circle back to you all on the legal comments below. Of particular interest is the comment and the proposed response below:



Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, October 17, 2018 11:51 AM
To: Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <tia.lyles@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS)

<Asher.Mikow@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>

Subject: Provider Reassignment Final Rule - Legal Comments

Hi Dawn and Caroline,

(b)(5)

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: [Fan, Kristin A. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#)
Subject: RE: Provider Reassignment Final Rule - Legal Comment
Date: Wednesday, October 24, 2018 12:44:17 PM

(b)(5)

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, October 24, 2018 10:46 AM
To: Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>
Subject: Provider Reassignment Final Rule - Legal Comment

Hey Kristin and Janet,

We had a chance to talk with Caroline Farrell and Dawn Popp yesterday and I wanted to make you all aware of a potential issue. Our conversation focused on the following comment:

(b)(5)

(b)(5)

Should we also bring this issue up in today's clearance meeting?

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (4

Mobile: ((b)(6) **)**

Fax: (410) 786-8533

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From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, October 17, 2018 11:51 AM
To: Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <tia.lyles@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>
Subject: Provider Reassignment Final Rule - Legal Comments

Hi Dawn and Caroline,

We have a couple comments and proposed responses we wanted to run by you all. I know you all will get a chance to review these comments and responses within the clearance process, but we want to try to iron these issues out before we put the final rule back into clearance this Friday:

-

(b)(5)

-

-

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Lynch, Calder \(CMS/OA\)](#); [Mack, Rosa \(CMS/CMCS\)](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: RE: Provider Reassignment Next Steps
Date: Wednesday, June 27, 2018 11:09:00 AM

Hey Calder,

(b)(5)

FMG has no issue with these edits.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
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From: Lynch, Calder (CMS/OA)
Sent: Wednesday, June 27, 2018 10:41 AM
To: Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: Provider Reassignment Next Steps

What were OMB's edits? Can you summarize for me?

--

Calder Lynch

Senior Counselor
Office of the Administrator
Centers for Medicare & Medicaid Services (CMS)
Washington, DC 20201
Office: (202) 619-0630

From: Mack, Rosa (CMS/CMCS)
Sent: Wednesday, June 27, 2018 9:33 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: Fwd: Provider Reassignment Next Steps

Thanks, Chris!

I'm at an appointment, so adding Calder.

Begin forwarded message:

From: "Thompson, Christopher C. (CMS/CMCS)" <Christopher.Thompson@cms.hhs.gov>
Date: June 27, 2018 at 9:31:19 AM EDT
To: "Mack, Rosa (CMS/CMCS)" <Rosa.Mack@cms.hhs.gov>, "Silanskis, Jeremy D. (CMS/CMCS)" <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: Provider Reassignment Next Steps

Hi Rosa,

(b)(5)

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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Fax: (410) 786-8533

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From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, June 27, 2018 9:05 AM
To: Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: Provider Reassignment Next Steps

Hi Rosa,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director

Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
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From: Mack, Rosa (CMS/CMCS)
Sent: Tuesday, June 26, 2018 6:11 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>;
Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: Fwd: Provider Reassignment Next Steps

Can you all take a look?

Begin forwarded message:

From: "Lynch, Calder (CMS/OA)" <Calder.Lynch@cms.hhs.gov>
Date: June 26, 2018 at 5:37:18 PM EDT
To: "Mack, Rosa (CMS/CMCS)" <Rosa.Mack@cms.hhs.gov>
Cc: "Hill, Timothy B. (CMS/CMCS)" <timothy.hill@cms.hhs.gov>, "Gifford, Deidre S. (CMS/CMCS)" <Deidre.Gifford@cms.hhs.gov>, "Fan, Kristin A. (CMS/CMCS)" <Kristin.Fan@cms.hhs.gov>, "Harshman, Sara (CMS/OL)" <Sara.Harshman@cms.hhs.gov>
Subject: RE: Provider Reassignment Next Steps

(b)(5)

Calder

--

Calder Lynch
Senior Counselor
Office of the Administrator
Centers for Medicare & Medicaid Services (CMS)
Washington, DC 20201
Office: (202) 619-0630

From: Mack, Rosa (CMS/CMCS)
Sent: Tuesday, June 26, 2018 11:46 AM
To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>
Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>
Subject: RE: Provider Reassignment Next Steps

Hi there. Any chance you were able to work on this?

From: Mack, Rosa (CMS/CMCS)
Sent: Friday, June 22, 2018 4:51 PM
To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>
Cc: Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>
Subject: Re: Provider Reassignment Next Steps

Ok. Thanks!

On Jun 22, 2018, at 4:49 PM, Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov> wrote:

(b)(5)

Calder

--

Calder Lynch
Senior Counselor
Office of the Administrator
Centers for Medicare & Medicaid Services (CMS)
Washington, DC 20201
Office: (202) 619-0630

From: Mack, Rosa (CMS/CMCS)
Sent: Friday, June 22, 2018 4:12 PM
To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS)

<Deidre.Gifford@cms.hhs.gov>

Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>;

Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>

Subject: RE: Provider Reassignment Next Steps

Calder: Let me know if you have any concerns/edits to the fact sheet and/or QAs.

From: Mack, Rosa (CMS/CMCS)

Sent: Friday, June 22, 2018 10:51 AM

To: Lynch, Calder (CMS/OA) <calder.lynch@cms.hhs.gov>;

Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>;

Gifford, Deidre S. (CMS/CMCS)

<Deidre.Gifford@cms.hhs.gov>

Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>;

Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>

Subject: RE: Provider Reassignment Next Steps

Attached are the QAs and the fact sheet. OC is working on drafting the press release.

With the news that we are going to roll this into the Medicaid PI strategy announcement, should there be one release that mentions both? Or are we still working on two separate ones?

From: Lynch, Calder (CMS/OA)

Sent: Friday, June 22, 2018 10:08 AM

To: Harshman, Sara (CMS/OL)

<Sara.Harshman@cms.hhs.gov>

Cc: Hill, Timothy B. (CMS/CMCS)

<timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS)

<Deidre.Gifford@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS)

<Kristin.Fan@cms.hhs.gov>; Mack, Rosa (CMS/CMCS)

<Rosa.Mack@cms.hhs.gov>

Subject: Re: Provider Reassignment Next Steps

It sounds like we are going to roll this into the Medicaid PI strategy announcement on Wednesday.

Sent from my iPhone

On Jun 22, 2018, at 10:06 AM, Harshman, Sara (CMS/OL)

<Sara.Harshman@cms.hhs.gov> wrote:

(b)(5)

Sara Harshman
The Center for Medicaid and CHIP Services
Desk: (202) 205-8361
Cell: (b)(6)

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Harris, Melissa L. \(CMS/CMCS\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: RE: Provider Reassignment paper for OGD review
Date: Wednesday, October 10, 2018 9:53:00 AM

Hi Melissa,

Thank you for the update! Yes, can you please forward the appointment to us.

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

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From: Harris, Melissa L. (CMS/CMCS)

Sent: Wednesday, October 10, 2018 9:51 AM

To: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: FW: Provider Reassignment paper for OGD review

Hi FMG, DE is planning to elevate the attached paper to OCD today, as part of our Clearance discussion tomorrow. It's very high level, and you'll notice that the scale of the issue (of health insurance withholds) is much lower than we feared at our last meeting. This is based on some quick research. Happy to answer any questions. Do you need the appointment for Clearance tomorrow afternoon?

Melissa Harris

Senior Policy Advisor
Disabled and Elderly Health Programs Group
Center for Medicaid and CHIP Services
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7500 Security Boulevard

Mail Stop S2-14-26
Baltimore, MD 21244
(p) 410-786-3397
melissa.harris@cms.hhs.gov



Please consider the environment before printing this e-mail.

From: Deboy, Alissa M. (CMS/CMCS)
Sent: Wednesday, October 10, 2018 8:11 AM
To: Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>
Cc: Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>
Subject: RE: Provider Reassignment paper for OGD review

< [REDACTED] (b)(5) [REDACTED] >

One small change. I cleaned up the document. It is attached and ready to go to FMG.

Alissa Mooney DeBoy

Deputy Director

Disabled and Elderly Health Programs Group

Centers for Medicare and Medicaid Services

7500 Security Blvd

Mailstop S2-14-26

Baltimore, MD 21244

(410) 786-1699

Email: Alissa.deboy1@cms.hhs.gov

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From: Nardone, Michael P. (CMS/CMCS)
Sent: Wednesday, October 10, 2018 7:12 AM
To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>
Cc: Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>
Subject: RE: Provider Reassignment paper for OGD review

[REDACTED] (b)(5) [REDACTED]

Couple of suggested edits. Otherwise I am OK if Alissa is. Mike

From: Harris, Melissa L. (CMS/CMCS)
Sent: Tuesday, October 9, 2018 5:43 PM
To: Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>
Cc: Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>
Subject: RE: Provider Reassignment paper for OGD review

I will send to FMG once you've blessed this.

(b)(5)

Melissa Harris

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Please consider the environment before printing this e-mail.

From: Jensen, Kirsten (CMS/CMCS)
Sent: Friday, October 5, 2018 12:58 PM
To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>
Subject: RE: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j), 1915(k), and 1115 authorities

Yes, that was the intent.

From: Harris, Melissa L. (CMS/CMCS)
Sent: Friday, October 5, 2018 12:48 PM
To: Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS)

<Kirsten.Jensen@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j) , 1915(k), and 1115 authorities

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Melissa Harris

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Please consider the environment before printing this e-mail.

From: Cantwell, Kenya J. (CMS/CMCS)

Sent: Friday, October 5, 2018 12:18 PM

To: Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j) , 1915(k), and 1115 authorities

<< (b)(5)

From: Jensen, Kirsten (CMS/CMCS)

Sent: Friday, October 5, 2018 11:28 AM

To: Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j) , 1915(k), and 1115 authorities

Yes please.

From: Cantwell, Kenya J. (CMS/CMCS)

Sent: Friday, October 5, 2018 10:53 AM

To: Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j) , 1915(k), and 1115 authorities

(b)(5)

From: Lollar, Ralph F. (CMS/CMCS)

Sent: Friday, October 5, 2018 10:10 AM

To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS)

<Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j) , 1915(k), and 1115 authorities

(b)(5)

Ralph

From: Harris, Melissa L. (CMS/CMCS)

Sent: Friday, October 5, 2018 10:08 AM

To: Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j) , 1915(k), and 1115 authorities

Thanks! And you were comfortable with the talking points on the second page?

Melissa Harris

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From: Lollar, Ralph F. (CMS/CMCS)

Sent: Friday, October 5, 2018 10:07 AM

To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j) , 1915(k), and 1115 authorities

Melissa,

(b)(5)

Ralph

From: Harris, Melissa L. (CMS/CMCS)

Sent: Thursday, October 4, 2018 4:29 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j) , 1915(k), and 1115 authorities

(b)(5)

(b)(5)

Melissa Harris

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melissa.harris@cms.hhs.gov



Please consider the environment before printing this e-mail.

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Thursday, October 4, 2018 4:14 PM

To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j) , 1915(k), and 1115 authorities

Hey Melissa and Kenya,

(b)(5)

(b)(5)

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

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From: Harris, Melissa L. (CMS/CMCS)

Sent: Monday, October 1, 2018 5:03 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j) , 1915(k), and 1115 authorities

(b)(5)

Melissa Harris

Senior Policy Advisor
Disabled and Elderly Health Programs Group
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Centers for Medicare and Medicaid Services
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Baltimore, MD 21244
(p) 410-786-3397
melissa.harris@cms.hhs.gov



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-----Original Appointment-----

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Thursday, September 27, 2018 2:12 PM

To: Thompson, Christopher C. (CMS/CMCS); Fan, Kristin A. (CMS/CMCS); Freeze, Janet G. (CMS/CMCS); Silanskis, Jeremy D. (CMS/CMCS); Ihrig, Jocelyn B. (CMS/CMCS); Mikow, Asher S. (CMS/CMCS); Lyles, Tia (CMS/CMCS); Brown, Sharon J. (CMS/CMCS); Sabir, Jeremiah A. (CMS/CMCS); Johns, Hamilton J. (CMS/CMCS); Popp, Dawn (HHS/OGC); Farrell, Caroline (HHS/OGC); Lollar, Ralph F. (CMS/CMCS); Kayala, Dianne E. (CMS/CMCS); Harris, Melissa L. (CMS/CMCS); Cantwell, Kenya J. (CMS/CMCS); Jensen, Kirsten

(CMS/CMCS); Kirchner, Nancy (CMS/CMCS); Poisal, Kathryn J. (CMS/CMCS); Failla, George P. (CMS/CMCS)
Cc: Nardone, Michael P. (CMS/CMCS); Deboy, Alissa M. (CMS/CMCS); Delozier, Adrienne M. (CMS/CMCS)
Subject: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j) , 1915(k), and 1115 authorities
When: Monday, October 1, 2018 2:30 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: CMS S3-20-01

The purpose of this meeting is to discuss that following question that was sent to OGC this past Monday:

DO NOT DELETE OR CHANGE ANY OF THE TEXT BELOW THIS LINE

CHRISTOPHER THOMPSON has scheduled this WebEx meeting.

Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j) , 1915(k), and 1115 authorities

Host: CHRISTOPHER THOMPSON

Access Information

1. Please call the following number:

WebEx: (b)(5)

2. Follow the instructions you hear on the phone.

Your WebEx Meeting Number (b)(5)

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To join from a Cisco VoIP enabled CMS Region or from CMS Central Office

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1. Go to (b)(5)
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3. If a password is required, enter the meeting password: (This meeting does not require a password.)
4. Click "Join".
5. Follow the instructions that appear on your screen.

+++++

This meeting may be recorded by the host. If you have questions, please contact the host.

+++++

Hosts, need your host access code or key? Go to the meeting information page:

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From: [Harris, Melissa L. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Cantwell, Kenya J. \(CMS/CMCS\)](#)
Cc: [Brown, Sharon J. \(CMS/CMCS\)](#)
Subject: RE: Provider Reassignment paper for OGD review
Date: Wednesday, October 10, 2018 2:37:32 PM

(b)(5)

Melissa Harris

Senior Policy Advisor
Disabled and Elderly Health Programs Group
Center for Medicaid and CHIP Services
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Mail Stop S2-14-26
Baltimore, MD 21244
(p) 410-786-3397
melissa.harris@cms.hhs.gov



Please consider the environment before printing this e-mail.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, October 10, 2018 10:56 AM
To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>
Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>
Subject: RE: Provider Reassignment paper for OGD review

Hey Melissa and Kenya,

(b)(5)

(b)(5)

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

Mobile: (b)(6)

Fax: (410) 786-8533

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Harris, Melissa L. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Cantwell, Kenya J. \(CMS/CMCS\)](#)
Cc: [Brown, Sharon J. \(CMS/CMCS\)](#)
Subject: RE: Provider Reassignment paper for OGD review
Date: Wednesday, October 10, 2018 10:55:00 AM

Hey Melissa and Kenya,

(b)(5)

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

Mobile: (b)(6)

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Cantwell, Kenya J. \(CMS/CMCS\)](#)
Subject: RE: Provider Reassignment paper for OGD review
Date: Wednesday, October 10, 2018 4:13:00 PM

Hey Kenya,

Can you give me a call at 410-786-4044. I have some questions regarding the FMS issue.

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

Mobile: (b)(6)

Fax: (410) 786-8533

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From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, October 10, 2018 10:56 AM
To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>
Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>
Subject: RE: Provider Reassignment paper for OGD review

Hey Melissa and Kenya,

(b)(5)

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

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Phone: (410)786-4044

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Fax: (410) 786-8533

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From: [Freeze, Janet G. \(CMS/CMCS\)](#)
To: [Harris, Melissa L. \(CMS/CMCS\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: Provider Reassignment paper for OGD review
Date: Wednesday, October 10, 2018 9:53:23 AM

Yes, please send it. Thanks.

From: Harris, Melissa L. (CMS/CMCS)
Sent: Wednesday, October 10, 2018 9:51 AM
To: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: FW: Provider Reassignment paper for OGD review

Hi FMG, DE is planning to elevate the attached paper to OCD today, as part of our Clearance discussion tomorrow. It's very high level, and you'll notice that the scale of the issue (of health insurance withholds) is much lower than we feared at our last meeting. This is based on some quick research. Happy to answer any questions. Do you need the appointment for Clearance tomorrow afternoon?

Melissa Harris
Senior Policy Advisor
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melissa.harris@cms.hhs.gov



Please consider the environment before printing this e-mail.

From: Deboy, Alissa M. (CMS/CMCS)
Sent: Wednesday, October 10, 2018 8:11 AM
To: Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>
Cc: Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>
Subject: RE: Provider Reassignment paper for OGD review

<< [REDACTED] (b)(5) [REDACTED]>>

One small change. I cleaned up the document. It is attached and ready to go to FMG.

Alissa Mooney DeBoy

Deputy Director

Disabled and Elderly Health Programs Group

Centers for Medicare and Medicaid Services

7500 Security Blvd

Mailstop S2-14-26

Baltimore, MD 21244

(410) 786-1699

Email: Alissa.deboy1@cms.hhs.gov

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From: Nardone, Michael P. (CMS/CMCS)

Sent: Wednesday, October 10, 2018 7:12 AM

To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Cc: Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>

Subject: RE: Provider Reassignment paper for OGD review

<< File: Provider Reassignment Rescission for OCD.docx >>

Couple of suggested edits. Otherwise I am OK if Alissa is. Mike

From: Harris, Melissa L. (CMS/CMCS)

Sent: Tuesday, October 9, 2018 5:43 PM

To: Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Cc: Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>

Subject: RE: Provider Reassignment paper for OGD review

I will send to FMG once you've blessed this. <<

(b)(5)

Melissa Harris

Senior Policy Advisor
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melissa.harris@cms.hhs.gov



Please consider the environment before printing this e-mail.

From: Jensen, Kirsten (CMS/CMCS)

Sent: Friday, October 5, 2018 12:58 PM

To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j) , 1915(k), and 1115 authorities

Yes, that was the intent.

From: Harris, Melissa L. (CMS/CMCS)

Sent: Friday, October 5, 2018 12:48 PM

To: Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j) , 1915(k), and 1115 authorities

(b)(5)

Melissa Harris

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Baltimore, MD 21244
(p) 410-786-3397
melissa.harris@cms.hhs.gov



Please consider the environment before printing this e-mail.

From: Cantwell, Kenya J. (CMS/CMCS)

Sent: Friday, October 5, 2018 12:18 PM

To: Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j) , 1915(k), and 1115 authorities

<

(b)(5)

From: Jensen, Kirsten (CMS/CMCS)

Sent: Friday, October 5, 2018 11:28 AM

To: Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j) , 1915(k), and 1115 authorities

Yes please.

From: Cantwell, Kenya J. (CMS/CMCS)

Sent: Friday, October 5, 2018 10:53 AM

To: Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j) , 1915(k), and 1115 authorities

Do you want the same of (j) and (k)?

From: Lollar, Ralph F. (CMS/CMCS)

Sent: Friday, October 5, 2018 10:10 AM

To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j) , 1915(k), and 1115 authorities

(b)(5)

Ralph

From: Harris, Melissa L. (CMS/CMCS)

Sent: Friday, October 5, 2018 10:08 AM

To: Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze,

Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j) , 1915(k), and 1115 authorities

Thanks! And you were comfortable with the talking points on the second page?

Melissa Harris

Senior Policy Advisor

Disabled and Elderly Health Programs Group

Center for Medicaid and CHIP Services

Centers for Medicare and Medicaid Services

7500 Security Boulevard

Mail Stop S2-14-26

Baltimore, MD 21244

(p) 410-786-3397

melissa.harris@cms.hhs.gov



Please consider the environment before printing this e-mail.

From: Lollar, Ralph F. (CMS/CMCS)

Sent: Friday, October 5, 2018 10:07 AM

To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j) , 1915(k), and 1115 authorities

Melissa,

I made one edit and added a comment.

(b)(5)

Ralph

From: Harris, Melissa L. (CMS/CMCS)

Sent: Thursday, October 4, 2018 4:29 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j) , 1915(k), and 1115 authorities

(b)(5)

Melissa Harris

Senior Policy Advisor
Disabled and Elderly Health Programs Group
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Centers for Medicare and Medicaid Services
7500 Security Boulevard
Mail Stop S2-14-26
Baltimore, MD 21244
(p) 410-786-3397
melissa.harris@cms.hhs.gov



Please consider the environment before printing this e-mail.

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Thursday, October 4, 2018 4:14 PM

To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j) , 1915(k), and 1115 authorities

Hey Melissa and Kenya,

(b)(5)

(b)(5)

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

Mobile: (b)(6)

Fax: (410) 786-8533

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From: Harris, Melissa L. (CMS/CMCS)

Sent: Monday, October 1, 2018 5:03 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Nardone, Michael P. (CMS/CMCS) <Michael.Nardone@cms.hhs.gov>; Deboy, Alissa M. (CMS/CMCS) <alissa.deboy1@cms.hhs.gov>

Subject: RE: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j), 1915(k), and 1115 authorities

(b)(5)

(b)(5)

Melissa Harris

Senior Policy Advisor
Disabled and Elderly Health Programs Group
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Centers for Medicare and Medicaid Services
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Baltimore, MD 21244
(p) 410-786-3397
melissa.harris@cms.hhs.gov



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-----Original Appointment-----

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Thursday, September 27, 2018 2:12 PM

To: Thompson, Christopher C. (CMS/CMCS); Fan, Kristin A. (CMS/CMCS); Freeze, Janet G. (CMS/CMCS); Silanskis, Jeremy D. (CMS/CMCS); Ihrig, Jocelyn B. (CMS/CMCS); Mikow, Asher S. (CMS/CMCS); Lyles, Tia (CMS/CMCS); Brown, Sharon J. (CMS/CMCS); Sabir, Jeremiah A. (CMS/CMCS); Johns, Hamilton J. (CMS/CMCS); Popp, Dawn (HHS/OGC); Farrell, Caroline (HHS/OGC); Lollar, Ralph F. (CMS/CMCS); Kayala, Dianne E. (CMS/CMCS); Harris, Melissa L. (CMS/CMCS); Cantwell, Kenya J. (CMS/CMCS); Jensen, Kirsten (CMS/CMCS); Kirchner, Nancy (CMS/CMCS); Poisal, Kathryn J. (CMS/CMCS); Failla, George P. (CMS/CMCS)
Cc: Nardone, Michael P. (CMS/CMCS); Deboy, Alissa M. (CMS/CMCS); Delozier, Adrienne M. (CMS/CMCS)
Subject: Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j), 1915(k), and 1115 authorities

When: Monday, October 1, 2018 2:30 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: CMS S3-20-01

The purpose of this meeting is to discuss that following question that was sent to OGC this past Monday:

DO NOT DELETE OR CHANGE ANY OF THE TEXT BELOW THIS LINE

CHRISTOPHER THOMPSON has scheduled this WebEx meeting.

Provider Reassignment and Self-Direction under 1905(a), 1915(c), 1915(i), 1915(j), 1915(k), and 1115 authorities

Host: CHRISTOPHER THOMPSON

Access Information

1. Please call the following number:

WebEx: (b)(5)

2. Follow the instructions you hear on the phone.

Your WebEx Meeting Number (b)(5)

=====

To join from a Cisco VoIP enabled CMS Region or from CMS Central Office

1. Dial ext. (b)(5)

Enter Meeting Number: Use Meeting WebEx Number provided above.

=====

To join this meeting online

1. Go to (b)(5)
2. If requested, enter your name and email address.
3. If a password is required, enter the meeting password: (This meeting does not require a password.)
4. Click "Join".
5. Follow the instructions that appear on your screen.

+++++

This meeting may be recorded by the host. If you have questions, please contact the host.

+++++

Hosts, need your host access code or key? Go to the meeting information page:

(b)(5)

Delivering the power of collaboration

The meetings.cms.gov team

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Boston, Beverly A. \(CMS/CMCS\)](#)
Subject: RE: Provider Reassignment Regulation
Date: Monday, October 22, 2018 1:07:00 PM

Thanks Beverly!

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Boston, Beverly A. (CMS/CMCS)
Sent: Monday, October 22, 2018 12:56 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>
Subject: FW: Provider Reassignment Regulation

FYI- I pinged

Beverly

From: Boston, Beverly A. (CMS/CMCS)
Sent: Monday, October 22, 2018 12:52 PM
To: Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>
Subject: FW: Provider Reassignment Regulation

Do you know where the OCD is with clearing the provider payment rule? Our deadline that Calder negotiated was Friday to OSORA, but we will need to get the greenlight from the OCD before moving the reg.

Thanks

Beverly

From: Fan, Kristin A. (CMS/CMCS)
Sent: Friday, October 19, 2018 2:15 PM
To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Mayhew, Mary (CMS/OA) <Mary.Mayhew@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>
Cc: Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: Provider Reassignment Regulation

Attached is a clean version of the final reg as well as an updated overview of comments received. Please let us know if there are any questions and if we can move it to OSORA early next week.

From: [Fan, Kristin A. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#)
Subject: Re: Provider reassignment
Date: Tuesday, June 12, 2018 9:59:32 AM

Wonderful!

Sent from my iPhone

> On Jun 12, 2018, at 8:40 AM, Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov> wrote:

>

> Hi Kristin

>

> It looks like Kelly Cleary will clear the revised language today and I will be able to put the package back into clearance today. Below is the language that has been provisionally cleared by KC:

>

(b)(5)

>

>

(b)(5)

>

> Thank you,

>

> Chris Thompson

> Deputy Division Director

> Division of Reimbursement & State Financing

> Center for Medicaid and CHIP Services

> Centers for Medicare & Medicaid Services

> 7500 Security Blvd., Mail Stop S3-14-28

> Baltimore, MD 21244

> Phone: (410)786-4044

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>

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>

>

> -----Original Message-----

> From: Fan, Kristin A. (CMS/CMCS)

> Sent: Tuesday, June 12, 2018 9:17 AM

> To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

> Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>

> Subject: Provider reassignment

>

> Just checking- in on where we stand with new impact language.

>

> Sent from my iPhone

From: [Kayala, Dianne E. \(CMS/CMCS\)](#)
To: [Lollar, Ralph F. \(CMS/CMCS\)](#); [Blackfield, Anne \(CMS/CMCS\)](#); [Failla, George P. \(CMS/CMCS\)](#); [Sciulli, Margherita R. \(CMS/CMCS\)](#); [Cantwell, Kenya J. \(CMS/CMCS\)](#); [Jensen, Kirsten \(CMS/CMCS\)](#); [Kirchner, Nancy \(CMS/CMCS\)](#)
Cc: [Poisal, Kathryn J. \(CMS/CMCS\)](#); [Harris, Melissa L. \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: Provider Reimbursement Reassignment NPRM and (b)(5)
Date: Tuesday, June 5, 2018 11:59:47 AM

Sorry, I finished below

Dianne Kayala, MS
Division of Long Term Services and Supports
Office: 410-786-3417

From: Lollar, Ralph F. (CMS/CMCS)
Sent: Tuesday, June 5, 2018 11:48 AM
To: Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Blackfield, Anne (CMS/CMCS) <Anne.Blackfield@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: Provider Reimbursement Reassignment NPRM and (b)(5)

(b)(5)

Dianne, is there something missing here?

Ralph

From: Kayala, Dianne E. (CMS/CMCS)
Sent: Tuesday, June 5, 2018 11:46 AM
To: Blackfield, Anne (CMS/CMCS) <Anne.Blackfield@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: Provider Reimbursement Reassignment NPRM and (b)(5)

(b)(5)

(b)(5)

(b)(5)

Dianne Kayala, MS
Division of Long Term Services and Supports
Office: 410-786-3417

From: Blackfield, Anne (CMS/CMCS)
Sent: Tuesday, June 5, 2018 11:16 AM
To: Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: Provider Reimbursement Reassignment NPRM and (b)(5)

(b)(5)

(b)(5)

From: Lollar, Ralph F. (CMS/CMCS)
Sent: Monday, June 4, 2018 5:38 PM
To: Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Blackfield, Anne (CMS/CMCS) <Anne.Blackfield@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: Provider Reimbursement Reassignment NPRM and (b)(5)

(b)(5)

Looping in Kirsten, Nancy and Kenya because Chris' question also has implications for the 1915(j).

Ralph

From: Failla, George P. (CMS/CMCS)

Sent: Monday, June 4, 2018 5:25 PM

To: Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>

Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Blackfield, Anne (CMS/CMCS) <Anne.Blackfield@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: FW: Provider Reimbursement Reassignment NPRM and (b)(5)

(b)(5)

Adding Marge, Dianne and Ralph

George

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, June 4, 2018 5:20 PM

To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>

Subject: Provider Reimbursement Reassignment NPRM and (b)(5)

Hello all,

(b)(5)

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

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From: [Lollar, Ralph F. \(CMS/CMCS\)](#)
To: [Kayala, Dianne E.\(CMS/CMCS\)](#); [Blackfield, Anne \(CMS/CMCS\)](#); [Failla, George P. \(CMS/CMCS\)](#); [Sciulli, Margherita R. \(CMS/CMCS\)](#); [Cantwell, Kenya J. \(CMS/CMCS\)](#); [Jensen, Kirsten \(CMS/CMCS\)](#); [Kirchner, Nancy \(CMS/CMCS\)](#)
Cc: [Poisal, Kathryn J. \(CMS/CMCS\)](#); [Harris, Melissa L. \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: Provider Reimbursement Reassignment NPRM and (b)(5)
Date: Tuesday, June 5, 2018 11:47:54 AM

Dianne, is there something missing here?

Ralph

From: Kayala, Dianne E.(CMS/CMCS)
Sent: Tuesday, June 5, 2018 11:46 AM
To: Blackfield, Anne (CMS/CMCS) <Anne.Blackfield@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: Provider Reimbursement Reassignment NPRM and (b)(5)

(b)(5)

(b)(5)

Dianne Kayala, MS
Division of Long Term Services and Supports
Office: 410-786-3417

From: Blackfield, Anne (CMS/CMCS)
Sent: Tuesday, June 5, 2018 11:16 AM
To: Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Kayala, Dianne E.(CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: Provider Reimbursement Reassignment NPRM and (b)(5)

(b)(5)

(b)(5)

From: Lollar, Ralph F. (CMS/CMCS)
Sent: Monday, June 4, 2018 5:38 PM
To: Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Blackfield, Anne (CMS/CMCS) <Anne.Blackfield@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: Provider Reimbursement Reassignment NPRM and (b)(5)

(b)(5)

Looping in Kirsten, Nancy and Kenya because Chris' question also has implications for the 1915(j).

Ralph

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Sent: Monday, June 4, 2018 5:25 PM
To: Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>
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Subject: FW: Provider Reimbursement Reassignment NPRM and (b)(5)

(b)(5)

Adding Marge, Dianne and Ralph

George

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, June 4, 2018 5:20 PM
To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>
Subject: Provider Reimbursement Reassignment NPRM and (b)(5)

Hello all,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW: This information has not been publicly disclosed and may be privileged and confidential. It is for internal government use only and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

From: [Kayala, Dianne E. \(CMS/CMCS\)](#)
To: [Blackfield, Anne \(CMS/CMCS\)](#); [Lollar, Ralph F. \(CMS/CMCS\)](#); [Failla, George P. \(CMS/CMCS\)](#); [Sciulli, Margherita R. \(CMS/CMCS\)](#); [Cantwell, Kenya J. \(CMS/CMCS\)](#); [Jensen, Kirsten \(CMS/CMCS\)](#); [Kirchner, Nancy \(CMS/CMCS\)](#)
Cc: [Poisal, Kathryn J. \(CMS/CMCS\)](#); [Harris, Melissa L. \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: Provider Reimbursement Reassignment NPRM and (b)(5)
Date: Tuesday, June 5, 2018 11:46:20 AM

(b)(5)

Dianne Kayala, MS
Division of Long Term Services and Supports
Office: 410-786-3417

From: Blackfield, Anne (CMS/CMCS)
Sent: Tuesday, June 5, 2018 11:16 AM
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Subject: RE: Provider Reimbursement Reassignment NPRM and

(b)(5)

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Looping in Kirsten, Nancy and Kenya because Chris' question also has implications for the 1915(j).

Ralph

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Sent: Monday, June 4, 2018 5:25 PM

To: Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>

Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Blackfield, Anne (CMS/CMCS) <Anne.Blackfield@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: FW: Provider Reimbursement Reassignment NPRM and

(b)(5)

(b)(5)

Adding Marge, Dianne and Ralph

George

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, June 4, 2018 5:20 PM

To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>

Subject: Provider Reimbursement Reassignment NPRM and

(b)(5)

Hello all,

(b)(5)

Thank you,

Chris Thompson

Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: [Lollar, Ralph F. \(CMS/CMCS\)](#)
To: [Failla, George P. \(CMS/CMCS\)](#); [Sciulli, Margherita R. \(CMS/CMCS\)](#); [Kayala, Dianne E. \(CMS/CMCS\)](#); [Cantwell, Kenya J. \(CMS/CMCS\)](#); [Jensen, Kirsten \(CMS/CMCS\)](#); [Kirchner, Nancy \(CMS/CMCS\)](#)
Cc: [Poisal, Kathryn J. \(CMS/CMCS\)](#); [Harris, Melissa L. \(CMS/CMCS\)](#); [Blackfield, Anne \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: Provider Reimbursement Reassignment NPRM and (b)(5)
Date: Monday, June 4, 2018 5:37:50 PM

Looping in Kirsten, Nancy and Kenya because Chris' question also has implications for the 1915(j).

Ralph

From: Failla, George P. (CMS/CMCS)
Sent: Monday, June 4, 2018 5:25 PM
To: Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Blackfield, Anne (CMS/CMCS) <Anne.Blackfield@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: FW: Provider Reimbursement Reassignment NPRM and (b)(5)
(b)(5)

Adding Marge, Dianne and Ralph

George

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Sent: Monday, June 4, 2018 5:20 PM
To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>
Subject: Provider Reimbursement Reassignment NPRM and (b)(5)

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Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
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Centers for Medicare & Medicaid Services
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From: [Lollar, Ralph F. \(CMS/CMCS\)](#)
To: [Failla, George P. \(CMS/CMCS\)](#); [Sciulli, Margherita R. \(CMS/CMCS\)](#); [Kayala, Dianne E. \(CMS/CMCS\)](#)
Cc: [Poisal, Kathryn J. \(CMS/CMCS\)](#); [Harris, Melissa L. \(CMS/CMCS\)](#); [Blackfield, Anne \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: Provider Reimbursement Reassignment NPRM and (b)(5)
Date: Monday, June 4, 2018 5:36:23 PM

See below in red.

Ralph

From: Failla, George P. (CMS/CMCS)
Sent: Monday, June 4, 2018 5:25 PM
To: Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Blackfield, Anne (CMS/CMCS) <Anne.Blackfield@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: FW: Provider Reimbursement Reassignment NPRM and (b)(5)
(b)(5)

Adding Marge, Dianne and Ralph

George

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, June 4, 2018 5:20 PM
To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>
Subject: Provider Reimbursement Reassignment NPRM and (b)(5)

Hello all,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Poisal, Kathryn J. \(CMS/CMCS\)](#); [Kayala, Dianne E. \(CMS/CMCS\)](#); [Lollar, Ralph F. \(CMS/CMCS\)](#); [Blackfield, Anne \(CMS/CMCS\)](#); [Failla, George P. \(CMS/CMCS\)](#); [Sciulli, Margherita R. \(CMS/CMCS\)](#); [Cantwell, Kenya J. \(CMS/CMCS\)](#); [Jensen, Kirsten \(CMS/CMCS\)](#); [Kirchner, Nancy \(CMS/CMCS\)](#)
Cc: [Harris, Melissa L. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: RE: Provider Reimbursement Reassignment NPRM and (b)(5)
Date: Tuesday, June 5, 2018 4:03:00 PM

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: Poisal, Kathryn J. (CMS/CMCS)
Sent: Tuesday, June 5, 2018 1:00 PM
To: Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Blackfield, Anne (CMS/CMCS) <Anne.Blackfield@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>
Cc: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: Provider Reimbursement Reassignment NPRM and (b)(5)

(b)(5)

Attached is a SMD letter on this subject from December 1993.

(b)(5)

From: Kayala, Dianne E.(CMS/CMCS)
Sent: Tuesday, June 5, 2018 12:00 PM
To: Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Blackfield, Anne (CMS/CMCS) <Anne.Blackfield@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: Provider Reimbursement Reassignment NPRM and (b)(5)

(b)(5)

Sorry, I finished below

Dianne Kayala, MS
Division of Long Term Services and Supports
Office: 410-786-3417

From: Lollar, Ralph F. (CMS/CMCS)
Sent: Tuesday, June 5, 2018 11:48 AM
To: Kayala, Dianne E.(CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Blackfield, Anne (CMS/CMCS) <Anne.Blackfield@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: Provider Reimbursement Reassignment NPRM and (b)(5)

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Dianne, is there something missing here?

Ralph

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Sent: Tuesday, June 5, 2018 11:46 AM
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Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: RE: Provider Reimbursement Reassignment NPRM and

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Dianne Kayala, MS
Division of Long Term Services and Supports
Office: 410-786-3417

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Sent: Tuesday, June 5, 2018 11:16 AM

To: Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>

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Subject: RE: Provider Reimbursement Reassignment NPRM and

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Sent: Monday, June 4, 2018 5:38 PM

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Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: RE: Provider Reimbursement Reassignment NPRM and

(b)(5)

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Looping in Kirsten, Nancy and Kenya because Chris' question also has implications for the 1915(j).

Ralph

From: Failla, George P. (CMS/CMCS)

Sent: Monday, June 4, 2018 5:25 PM

To: Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>

Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Blackfield, Anne (CMS/CMCS) <Anne.Blackfield@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: FW: Provider Reimbursement Reassignment NPRM and

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Adding Marge, Dianne and Ralph

George

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, June 4, 2018 5:20 PM

To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>

Subject: Provider Reimbursement Reassignment NPRM and

(b)(5)

Hello all,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Farrell, Caroline \(HHS/OGC\)](#)
Subject: RE: Provider Reimbursement Reassignment NPRM and
Date: Tuesday, June 5, 2018 3:01:00 PM

(b)(5)

Sure....3:30 works for me!

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Farrell, Caroline (HHS/OGC)
Sent: Tuesday, June 5, 2018 2:21 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: Re: Provider Reimbursement Reassignment NPRM and (b)(5)

(b)(5)

Thanks, Chris! Can we move our meeting to 330? My leadership just put an appointment on the calendar for 3. Thanks!

On: 05 June 2018 12:49,
"Thompson, Christopher C. (CMS/CMCS)" <Christopher.Thompson@cms.hhs.gov> wrote:

Please see the highlighted language below:

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

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From: Kayala, Dianne E.(CMS/CMCS)

Sent: Tuesday, June 5, 2018 12:00 PM

To: Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Blackfield, Anne (CMS/CMCS) <Anne.Blackfield@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: RE: Provider Reimbursement Reassignment NPRM and (b)(5)

(b)(5)

Sorry, I finished below

Dianne Kayala, MS

Division of Long Term Services and Supports

Office: 410-786-3417

From: Lollar, Ralph F. (CMS/CMCS)

Sent: Tuesday, June 5, 2018 11:48 AM

To: Kayala, Dianne E.(CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Blackfield, Anne (CMS/CMCS) <Anne.Blackfield@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: RE: Provider Reimbursement Reassignment NPRM and (b)(5)

(b)(5)

Dianne, is there something missing here?

Ralph

From: Kayala, Dianne E.(CMS/CMCS)

Sent: Tuesday, June 5, 2018 11:46 AM

To: Blackfield, Anne (CMS/CMCS) <Anne.Blackfield@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>

Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: RE: Provider Reimbursement Reassignment NPRM and

(b)(5)

(b)(5)

(b)(5)

Dianne Kayala, MS

Division of Long Term Services and Supports

Office: 410-786-3417

From: Blackfield, Anne (CMS/CMCS)

Sent: Tuesday, June 5, 2018 11:16 AM

To: Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Kayala, Dianne E.(CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>

Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: RE: Provider Reimbursement Reassignment NPRM and

(b)(5)

(b)(5)

(b)(5)

From: Lollar, Ralph F. (CMS/CMCS)

Sent: Monday, June 4, 2018 5:38 PM

To: Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Kirchner, Nancy (CMS/CMCS) <Nancy.Kirchner@cms.hhs.gov>

Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Blackfield, Anne (CMS/CMCS) <Anne.Blackfield@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: RE: Provider Reimbursement Reassignment NPRM and

(b)(5)

(b)(5)

Looping in Kirsten, Nancy and Kenya because Chris' question also has implications for the 1915(j).

Ralph

From: Failla, George P. (CMS/CMCS)

Sent: Monday, June 4, 2018 5:25 PM

To: Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Sciulli, Margherita R. (CMS/CMCS) <Margherita.Sciulli@cms.hhs.gov>; Kayala, Dianne E. (CMS/CMCS) <Dianne.Kayala@cms.hhs.gov>

Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Blackfield, Anne (CMS/CMCS) <Anne.Blackfield@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: FW: Provider Reimbursement Reassignment NPRM and

(b)(5)

(b)(5)

Adding Marge, Dianne and Ralph

George

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, June 4, 2018 5:20 PM

To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Failla, George P. (CMS/CMCS) <George.Failla@cms.hhs.gov>

Subject: Provider Reimbursement Reassignment NPRM and

(b)(5)

Hello all,

(b)(5)

(b)(5)

Thank you,

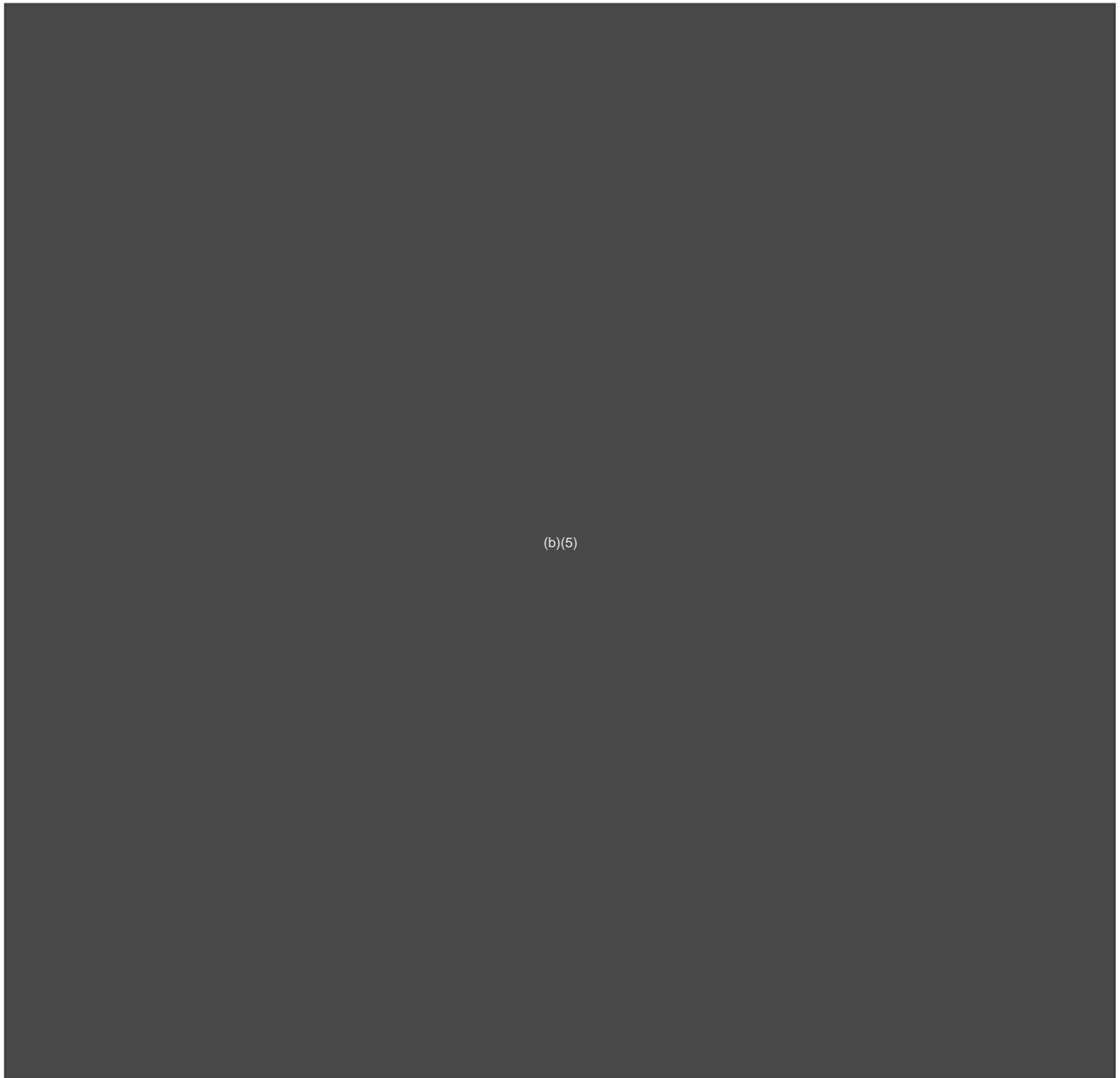
Chris Thompson
Deputy Division Director
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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Popp, Dawn \(HHS/OGC\)](#); [Farrell, Caroline \(HHS/OGC\)](#); [Harris, Melissa L. \(CMS/CMCS\)](#); [Cantwell, Kenya J. \(CMS/CMCS\)](#); [Lollar, Ralph F. \(CMS/CMCS\)](#); [Brown, Sharon J. \(CMS/CMCS\)](#); [Ihrig, Jocelyn B. \(CMS/CMCS\)](#); [Johns, Hamilton J. \(CMS/CMCS\)](#); [Lyles, Tia \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#); [Sabir, Jeremiah A. \(CMS/CMCS\)](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: RE: PRR - OGC Edits- FMS
Date: Tuesday, November 20, 2018 2:36:00 PM

Hi Melissa, Kenya and Ralph,

The questions below will help with our 4pm discussion. Below is our draft language to address the FMS issue:



(b)(5)

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

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-----Original Appointment-----

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, November 19, 2018 11:03 AM

To: Thompson, Christopher C. (CMS/CMCS); Popp, Dawn (HHS/OGC); Farrell, Caroline (HHS/OGC); Harris, Melissa L. (CMS/CMCS); Cantwell, Kenya J. (CMS/CMCS); Lollar, Ralph F. (CMS/CMCS); Brown, Sharon J. (CMS/CMCS); Ihrig, Jocelyn B. (CMS/CMCS); Johns, Hamilton J. (CMS/CMCS); Lyles, Tia (CMS/CMCS); Mikow, Asher S. (CMS/CMCS); Sabir, Jeremiah A. (CMS/CMCS)

Cc: Silanskis, Jeremy D. (CMS/CMCS)

Subject: PRR - OGC Edits- FMS

When: Tuesday, November 20, 2018 4:00 PM-4:30 PM (UTC-05:00) Eastern Time (US & Canada).

Where: CMS S3-20-01

To discuss language to draw a distinction between the arrangements under FMS and reassignment for 1905(a) services.

DO NOT DELETE OR CHANGE ANY OF THE TEXT BELOW THIS LINE

CHRISTOPHER THOMPSON has scheduled this WebEx meeting.

PRR - OGC Edits- FMS

Host: CHRISTOPHER THOMPSON

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+++++

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(b)(5)

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Farrell, Caroline \(HHS/OGC\)](#)
Subject: RE: PRR - RIA *** \$0 -160 million range ***
Date: Tuesday, June 12, 2018 11:09:00 AM

Good Morning Caroline,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
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From: Farrell, Caroline (HHS/OGC)

Sent: Monday, June 11, 2018 7:24 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: Re: PRR - RIA *** \$0 -160 million range ***

(b)(5)

On: 11 June 2018 15:45,

"Thompson, Christopher C. (CMS/CMCS)" <Christopher.Thompson@cms.hhs.gov> wrote:

Hi Caroline,

(b)(5)

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

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Fax: (410) 786-8533

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may result in prosecution to the full extent of the law.

From: Farrell, Caroline (HHS/OGC)
Sent: Monday, June 11, 2018 3:35 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: PRR - RIA *** \$1 -160 million range ***

Chris,

See attached for some edits reflecting my preliminary reactions. I have not sent this to Kelly yet, but if you are ok with the edits I will put the revised version in front of Kelly to make sure she agrees with it.

Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, June 11, 2018 1:58 PM
To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>
Subject: PRR - RIA *** \$1 -160 million range ***
Importance: High

Hi Caroline,

(b)(5)

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Cantwell, Kenya J. \(CMS/CMCS\)](#)
Subject: RE: PRR Comment Analysis - 8/3/16 CIB - references to 42 CFR 447.10(g)(4)
Date: Monday, October 15, 2018 4:36:00 PM

Hey Kenya,

This was more for awareness that a revision to the CIB will need to be made.

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

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From: Cantwell, Kenya J. (CMS/CMCS)
Sent: Monday, October 15, 2018 3:25 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: PRR Comment Analysis - 8/3/16 CIB - references to 42 CFR 447.10(g)(4)

Are you looking for feedback from us? I think Melissa needs to weigh in on this one and she is out of the office until Wed. I think.

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, October 15, 2018 1:26 PM

To: Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>

Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>

Subject: RE: PRR Comment Analysis - 8/3/16 CIB - references to 42 CFR 447.10(g)(4)

Hey DEH,

I wanted to give you guys a heads up on this comment and our proposed response. Attached is the document in question:

(b)(5)

Thank you,

<< File: (b)(5) >

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

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7500 Security Blvd., Mail Stop S3-14-28

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From: Cantwell, Kenya J. (CMS/CMCS)

Sent: Thursday, October 11, 2018 1:07 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>

Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>

Subject: RE: PRR Comment Analysis - NASUAD Comment and Response

How about this?

(b)(5)

(b)(5)

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Thursday, October 11, 2018 10:36 AM

To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>

Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>

Subject: PRR Comment Analysis - NASUAD Comment and Response

Please see the revised draft comment and response below:

(b)(5)

(b)(5)

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

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From: Thompson, Christopher C. (CMS/CMCS)

Sent: Wednesday, October 10, 2018 10:56 AM

To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>

Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>

Subject: RE: Provider Reassignment paper for OGD review

Hey Melissa and Kenya,

(b)(5)

(b)(5)

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Harris, Melissa L. \(CMS/CMCS\)](#); [Cantwell, Kenya J. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Lollar, Ralph F. \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#)
Subject: RE: PRR Comment Analysis - 8/3/16 CIB - references to 42 CFR 447.10(g)(4)
Date: Tuesday, October 16, 2018 11:25:00 AM

Hey Melissa,

We weren't planning to oversee the CIB revision. We can certainly bring this up with OCD to make them aware of the issue, but we figured DEH would issue the revision since you guys drafted the initial CIB.

Since we are just talking about the removal of one sentence, we should have a meeting to iron out this issue.

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

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From: Harris, Melissa L. (CMS/CMCS)

Sent: Tuesday, October 16, 2018 10:53 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS)

<Jeremy.Silanskis@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>;
Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>

Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jerimiah A.
(CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS)
<Asher.Mikow@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS)
<Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Ihrig,
Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>

Subject: RE: PRR Comment Analysis - 8/3/16 CIB - references to 42 CFR 447.10(g)(4)

Hi Chris, thanks for flagging this. That CIB wasn't on our radar screen (or at least it wasn't on mine). Is FMG planning to oversee the CIB revision?

Melissa Harris

Senior Policy Advisor
Disabled and Elderly Health Programs Group
Center for Medicaid and CHIP Services
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Mail Stop S2-14-26
Baltimore, MD 21244
(p) 410-786-3397
melissa.harris@cms.hhs.gov



Please consider the environment before printing this e-mail.

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, October 15, 2018 1:26 PM

To: Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Harris, Melissa L.
(CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS)
<Jeremy.Silanskis@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>;
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Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>

Subject: RE: PRR Comment Analysis - 8/3/16 CIB - references to 42 CFR 447.10(g)(4)

Hey DEH,

I wanted to give you guys a heads up on this comment and our proposed response. Attached is the document in question:

(b)(5)

(b)(5)

Thank you,

<< File: 080316 HCBS CIB (3).pdf >>

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

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From: Cantwell, Kenya J. (CMS/CMCS)

Sent: Thursday, October 11, 2018 1:07 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Harris,

Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>
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Subject: RE: PRR Comment Analysis - NASUAD Comment and Response

How about this?

(b)(5)

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Thursday, October 11, 2018 10:36 AM

To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>

Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A.

(CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>

Subject: PRR Comment Analysis - NASUAD Comment and Response

Please see the revised draft comment and response below:

(b)(5)

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

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From: Thompson, Christopher C. (CMS/CMCS)

Sent: Wednesday, October 10, 2018 10:56 AM

To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>

Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>

Subject: RE: Provider Reassignment paper for OGD review

Hey Melissa and Kenya,

(b)(5)

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Harris, Melissa L. \(CMS/CMCS\)](#)
Subject: RE: PRR Comment Analysis - 8/3/16 CIB - references to 42 CFR 447.10(g)(4)
Date: Tuesday, October 16, 2018 11:41:00 AM

Hey Melissa,

Is there another time tomorrow that works best for you?

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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-----Original Appointment-----

From: Harris, Melissa L. (CMS/CMCS)
Sent: Tuesday, October 16, 2018 11:38 AM
To: Thompson, Christopher C. (CMS/CMCS)
Subject: Declined: PRR Comment Analysis - 8/3/16 CIB - references to 42 CFR 447.10(g)(4)
When: Wednesday, October 17, 2018 9:00 AM-9:30 AM (UTC-05:00) Eastern Time (US & Canada).
Where: CMS S3-06-11

Hi Chris, I'm not available at this time, but if others in DE are, ok to move ahead. I'm in Chicago for the rest of the week, and booked up tomorrow morning.

From: [Harris, Melissa L. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Cc: [Cantwell, Kenya J. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Lollar, Ralph F. \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#)
Subject: Re: PRR Comment Analysis - 8/3/16 CIB - references to 42 CFR 447.10(g)(4)
Date: Tuesday, October 16, 2018 11:30:01 AM

Right, let's meet on it. It may even make sense to strike the sentence and move it as an accompaniment to the final rule in clearance. Thanks.

Sent from my iPhone

On Oct 16, 2018, at 11:25 AM, Thompson, Christopher C. (CMS/CMCS)
<Christopher.Thompson@cms.hhs.gov> wrote:

Hey Melissa,

We weren't planning to oversee the CIB revision. We can certainly bring this up with OCD to make them aware of the issue, but we figured DEH would issue the revision since you guys drafted the initial CIB.

Since we are just talking about the removal of one sentence, we should have a meeting to iron out this issue.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
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From: Harris, Melissa L. (CMS/CMCS)
Sent: Tuesday, October 16, 2018 10:53 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>
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Melissa Harris

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(p) 410-786-3397
melissa.harris@cms.hhs.gov

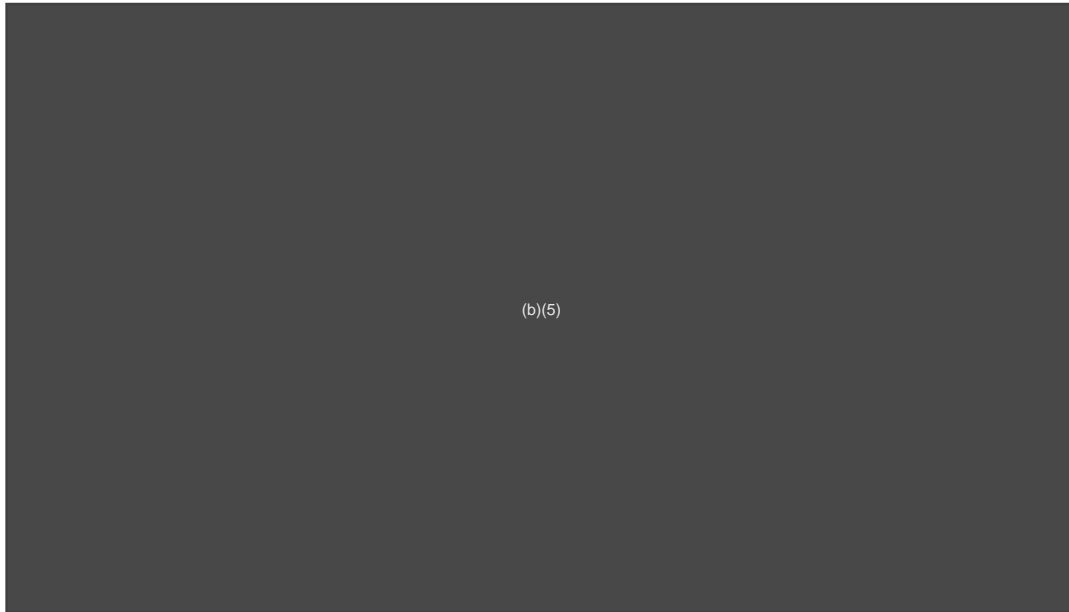


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Subject: RE: PRR Comment Analysis - 8/3/16 CIB - references to 42 CFR 447.10(g)(4)

Hey DEH,

I wanted to give you guys a heads up on this comment and our proposed response. Attached is the document in question:



Thank you,

<< (b)(5)

Chris Thompson
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How about this?

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Subject: PRR Comment Analysis - NASUAD Comment and Response

Please see the revised draft comment and response below:



Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
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Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>
Subject: RE: Provider Reassignment paper for OGD review

Hey Melissa and Kenya,

(b)(5)

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
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Subject: RE: PRR Comment Analysis - NASUAD Comment and Response
Date: Thursday, October 11, 2018 1:11:00 PM

This looks perfect!

Thanks Kenya!

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

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Please see the revised draft comment and response below:

(b)(5)

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

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Cc: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>

Subject: RE: Provider Reassignment paper for OGD review

Hey Melissa and Kenya,

(b)(5)

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

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From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: PRR Comment and Responses
Date: Thursday, October 11, 2018 8:49:07 AM

Aw, thanks! I think you & Jocelyn deserves the most credit.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Thursday, October 11, 2018 8:14 AM
To: Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>
Subject: RE: PRR Comment and Responses

Thanks Asher,

That sounds perfect and you are more than pulling your own weight. You and Jocelyn have gone above and beyond with regard to this team effort!

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
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From: Mikow, Asher S. (CMS/CMCS)
Sent: Thursday, October 11, 2018 6:13 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: PRR Comment and Responses

Hey Chris,

Sorry I had to cut out yesterday. I want to be sure I'm pulling my weight, so why don't I review at least the first few comments and responses for editing/grammatical purposes? I'll do that this morning and I won't change any content, just make general edits.

Thanks,

Asher

Technical Director

The Centers for Medicaid and CHIP Services
Financial Management Group, Division of Reimbursement and State Financing
7500 Security Blvd., Mail Stop S3-14-28, Baltimore MD 21244
Phone 410-786-6191

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Cantwell, Kenya J. \(CMS/CMCS\)](#); [Harris, Melissa L. \(CMS/CMCS\)](#); [Jensen, Kirsten \(CMS/CMCS\)](#); [Lollar, Ralph F. \(CMS/CMCS\)](#)
Cc: [Poisal, Kathryn J. \(CMS/CMCS\)](#); [Ihrig, Jocelyn B. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Sumeracki, Jodie M. \(CMS/CMCS\)](#)
Subject: RE: PRR Comments - NASUAD Letter ***Draft Preamble Language ***
Date: Wednesday, September 12, 2018 2:03:00 PM

Okay, perfect!

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: Cantwell, Kenya J. (CMS/CMCS)
Sent: Wednesday, September 12, 2018 2:03 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Sumeracki, Jodie M. (CMS/CMCS) <Jodie.Sumeracki@cms.hhs.gov>
Subject: RE: PRR Comments - NASUAD Letter ***Draft Preamble Language ***

Hi – I think so. We had to provide some info to our Group leadership that they are reviewing now.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, September 12, 2018 2:01 PM
To: Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Jensen, Kirsten (CMS/CMCS) <Kirsten.Jensen@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: RE: PRR Comments - NASUAD Letter ***Draft Preamble Language ***

Hey Kenya,

OCD wants us to bring the NASUAD issue to final resolution by the end of the week. I wanted to check in with you to see if we are still on schedule to finalize a response to the letter by the end of the week?

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, September 5, 2018 10:14 AM
To: Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: PRR Comments - NASUAD Letter ***Draft Preamble Language ***

Hey Kenya,

We don't need a quick turnaround on the response. A response by COB 9/14/18 would be perfect!

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Cantwell, Kenya J. (CMS/CMCS)
Sent: Wednesday, September 5, 2018 9:41 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: PRR Comments - NASUAD Letter ***Draft Preamble Language ***

How quickly do you need a response from us? I would like to discuss this at our DBC/DLTSS meeting, but we do not meet again until next Wed.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, September 4, 2018 5:12 PM
To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: PRR Comments - NASUAD Letter ***Draft Preamble Language ***

Thank you all for responding. In thinking about the language that will go into the preamble of the final rule. I am thinking it should read similar to the following:

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Harris, Melissa L. (CMS/CMCS)
Sent: Thursday, August 30, 2018 2:20 PM
To: Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: PRR Comments - NASUAD Letter

(b)(5)

Melissa Harris
Senior Policy Advisor
Disabled and Elderly Health Programs Group
Center for Medicaid and CHIP Services
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Mail Stop S3-14-28
Baltimore, MD 21244
(p) 410-786-3397
melissa.harris@cms.hhs.gov



Please consider the environment before printing this e-mail.

From: Cantwell, Kenya J. (CMS/CMCS)
Sent: Thursday, August 30, 2018 8:48 AM
To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: PRR Comments - NASUAD Letter

(b)(5)

I am also interested in Kathy's thoughts on this.

From: Harris, Melissa L. (CMS/CMCS)

Sent: Wednesday, August 29, 2018 3:20 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: Re: PRR Comments - NASUAD Letter

(b)(5)

Sent from my iPhone

On Aug 29, 2018, at 1:35 PM, Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov> wrote:

Hi Melissa, Kathy and Kenya,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director

Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Ihrig, Jocelyn B. (CMS/CMCS)
Sent: Wednesday, August 29, 2018 11:07 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: PRR Comments - NASUAD Letter

Hey Chris,

I found one letter so far from [NASUAD](#). I think that's the entity that was mentioned during clearance.

Thanks,
Jocelyn

<NASUAD Letter - CMS 2413-P - Provider Reimbursement Reassignment.pdf>

From: [Poisal, Kathryn J. \(CMS/CMCS\)](#)
To: [Cantwell, Kenya J. \(CMS/CMCS\)](#); [Harris, Melissa L. \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Cc: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Lollar, Ralph F. \(CMS/CMCS\)](#); [Failla, George P. \(CMS/CMCS\)](#)
Subject: RE: PRR Comments - NASUAD Letter
Date: Thursday, August 30, 2018 2:28:20 PM

I agree with Kenya that the individual's budget cannot be reduced to pay for FMS.

From: Cantwell, Kenya J. (CMS/CMCS)
Sent: Thursday, August 30, 2018 8:48 AM
To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: PRR Comments - NASUAD Letter

(b)(5)

(b)(5)

I am also interested in Kathy's thoughts on this.

From: Harris, Melissa L. (CMS/CMCS)

Sent: Wednesday, August 29, 2018 3:20 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: Re: PRR Comments - NASUAD Letter

(b)(5)

Sent from my iPhone

On Aug 29, 2018, at 1:35 PM, Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov> wrote:

Hi Melissa, Kathy and Kenya,

(b)(5)

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: Ihrig, Jocelyn B. (CMS/CMCS)
Sent: Wednesday, August 29, 2018 11:07 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: PRR Comments - NASUAD Letter

Hey Chris,

I found one letter so far from [NASUAD](#). I think that's the entity that was mentioned during clearance.

Thanks,
Jocelyn

<NASUAD Letter - CMS 2413-P - Provider Reimbursement Reassignment.pdf>

From: [Poisal, Kathryn J. \(CMS/CMCS\)](#)
To: [Harris, Melissa L. \(CMS/CMCS\)](#); [Cantwell, Kenya J. \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Cc: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Lollar, Ralph F. \(CMS/CMCS\)](#); [Failla, George P. \(CMS/CMCS\)](#)
Subject: RE: PRR Comments - NASUAD Letter
Date: Thursday, August 30, 2018 2:49:36 PM

(b)(5)

From: Harris, Melissa L. (CMS/CMCS)
Sent: Thursday, August 30, 2018 2:29 PM
To: Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: PRR Comments - NASUAD Letter

(b)(5)

Melissa Harris
Senior Policy Advisor
Disabled and Elderly Health Programs Group
Center for Medicaid and CHIP Services
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Mail Stop S2-14-26
Baltimore, MD 21244
(p) 410-786-3397
melissa.harris@cms.hhs.gov



Please consider the environment before printing this e-mail.

From: Cantwell, Kenya J. (CMS/CMCS)
Sent: Thursday, August 30, 2018 2:25 PM
To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: PRR Comments - NASUAD Letter

(b)(5)

(b)(5)

From: Harris, Melissa L. (CMS/CMCS)
Sent: Thursday, August 30, 2018 2:20 PM
To: Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: PRR Comments - NASUAD Letter

(b)(5)

Melissa Harris
Senior Policy Advisor
Disabled and Elderly Health Programs Group
Center for Medicaid and CHIP Services
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7500 Security Boulevard
Mail Stop S2-14-26
Baltimore, MD 21244
(p) 410-786-3397
melissa.harris@cms.hhs.gov



Please consider the environment before printing this e-mail.

From: Cantwell, Kenya J. (CMS/CMCS)
Sent: Thursday, August 30, 2018 8:48 AM
To: Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: PRR Comments - NASUAD Letter

(b)(5)

(b)(5)

I am also interested in Kathy's thoughts on this.

From: Harris, Melissa L. (CMS/CMCS)

Sent: Wednesday, August 29, 2018 3:20 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Cc: Poisal, Kathryn J. (CMS/CMCS) <Kathryn.Poisal@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: Re: PRR Comments - NASUAD Letter

(b)(5)

Sent from my iPhone

On Aug 29, 2018, at 1:35 PM, Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov> wrote:

Hi Melissa, Kathy and Kenya,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
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From: Ihrig, Jocelyn B. (CMS/CMCS)

Sent: Wednesday, August 29, 2018 11:07 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: PRR Comments - NASUAD Letter

Hey Chris,

I found one letter so far from [NASUAD](#). I think that's the entity that was mentioned during clearance.

Thanks,
Jocelyn

<NASUAD Letter - CMS 2413-P - Provider Reimbursement Reassignment.pdf>

From: [Cantwell, Kenya J. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: RE: PRR comments - Please see the chart below and the attached letters
Date: Thursday, September 20, 2018 1:46:27 PM

Thank you so much Chris. The DE team appreciates you sharing this info.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Thursday, September 20, 2018 1:20 PM
To: Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: PRR comments - Please see the chart below and the attached letters

Comment - 1811 Survival Coalition	CMS's August 2016 memo on Suggested Approaches for Strengthening and Stabilizing the Medicaid Home Care Workforce outlined options for states to stabilize (training, development, professional and peer support, career ladder opportunities, health insurance etc.) the workforce delivering home and community-based care (HCBS). Many of the workforce stabilization strategies encouraged in this memo rely on the current direct care worker exemption outlined in 42 CFR 447.10(g) (4). NPRM will reduce state flexibility and lead to higher turnover and beneficiaries in institutions which are more expensive.
Comment - 2574 California Long Term Care Education Center	Will have a negative impact on HCBS and consumer directed care
Comment - 2786 Easter Seals Disability Services, Boston Center for independent Living	Negative impact on access to and the quality of Medicaid-funded HCBS
Comment - 6258 Applied Self Direction	Request CMS to clarify 3 questions related to Medicaid funded self- directed HCBS
Comment - 5909 WVAHC	CMS is limiting the public comment period to 30 days. HCBS in Medicaid is critical to our rural state; concerned impact of this rule on seniors and people with disabilities.

Comment - 6003 American Civil Liberties Union	Proposed rule negative impact on Medicaid HCBS and the consumer directed model. No justification for a 30 day comment period.
Comment - 5993 Claire Ramsey - CA	Furthermore, CMS provides no justification for a 30-day comment period, which is far shorter than the standard 60-day period that is meant to provide meaningful opportunity for all stakeholders to comment. This is inadequate grounds on which to base a proposal for a policy change that CMS believes may have a major impact on state HCBS programs, home care workers, and the consumers who rely on these services. For all these reasons, we respectfully request CMS withdraw this proposed rule change.
Comment - 6372 Leadership Council on Civil and Human Rights	Home care workers ability to unionize improves workplace standards and strengthens Medicaid HCBS programs

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Cantwell, Kenya J. (CMS/CMCS)

Sent: Thursday, September 20, 2018 9:07 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: Regulation comments

Importance: High

Hi Chris – Can you send me all the comments that ask about HCBS? Thanks!

From: [Sabir, Jeremiah A. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: PRR Comments and Responses
Date: Tuesday, October 9, 2018 2:47:38 PM

Thank you.

Jerimiah A. Sabir

Social Science Research Analyst

Center for Medicare & Medicaid Services (CMS)

Center for Medicaid and CHIP Services (CMCS)

Financial Management Group (FMG)

Division of Reimbursement & State Financing (DRSF)

7500 Security Blvd., Mail Stop S3-14-22

Baltimore, MD 21244

Phone: (410) 786-2239

Fax: (410) 786-8533

E-mail: Jerimiah.Sabir@cms.hhs.gov

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, October 9, 2018 2:45 PM
To: Sabir, Jeremiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>
Subject: RE: PRR Comments and Responses

Here is the excel spreadsheet [Collapsed PRR Themes](#)

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

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From: Sabir, Jerimiah A. (CMS/CMCS)

Sent: Tuesday, October 9, 2018 2:41 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: RE: PRR Comments and Responses

Chris,

Can you send me the excel sheet that has the number code or the link to it. I am not able to find the document with the codes that we labeled by Jocelyn.

Thanks.

Jerimiah A. Sabir

Social Science Research Analyst

Center for Medicare & Medicaid Services (CMS)

Center for Medicaid and CHIP Services (CMCS)

Financial Management Group (FMG)

Division of Reimbursement & State Financing (DRSF)

7500 Security Blvd., Mail Stop S3-14-22

Baltimore, MD 21244

Phone: (410) 786-2239

Fax: (410) 786-8533

E-mail: Jerimiah.Sabir@cms.hhs.gov

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Tuesday, October 9, 2018 10:21 AM

To: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>

Subject: RE: PRR Comments and Responses

(b)(5)

Please add your comments and responses to [this sheet](#)

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

Mobile: (b)(6)

Fax: (410) 786-8533

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-----Original Appointment-----

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Friday, October 5, 2018 3:52 PM

To: Thompson, Christopher C. (CMS/CMCS); Brown, Sharon J. (CMS/CMCS); Lyles, Tia (CMS/CMCS); Mikow, Asher S. (CMS/CMCS); Sabir, Jerimiah A. (CMS/CMCS); Ihrig, Jocelyn B. (CMS/CMCS)

Subject: PRR Comments and Responses

When: Tuesday, October 9, 2018 10:30 AM-12:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: Independent Drafting of Responses

Assignments for Responses

Please flesh out the Comments and the Response for the following topics:

- 1) Loss of Benefit: Tia
- 2) General Harm: Jocelyn
- 3) Admin Burden: Hamilton
- 4) Reduce State Flexibility: Asher
- 5) Self-Direction - Tia
- 6) 30 day Comment Period/Economic Analysis - Hamilton
- 7) Factoring: Asher

- 8) Unions: Jocelyn
- 9) Other - to be addressed: Chris
- 10) Technical - Chris
- 11) Benefits not considered reassignment - Sharon
- 12) Rights - Jocelyn
- 13) Financial Impact to Providers: Jerimiah
- 14) Negative Financial Impact to States
- 15) Significant Impact: Hamilton
- Out of Scope – Questions Tab : Chris

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Ihrig, Jocelyn B. \(CMS/CMCS\)](#)
Subject: RE: PRR Comments and Responses
Date: Tuesday, October 9, 2018 12:30:00 PM

Hey Jocelyn,

(b)(5)

I will look at our calendars and try to set up a meeting for tomorrow to go through the responses.

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

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may result in prosecution to the full extent of the law.

From: Ihrig, Jocelyn B. (CMS/CMCS)

Sent: Tuesday, October 9, 2018 12:02 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: RE: PRR Comments and Responses

Hi Chris,

(b)(5)

Also, I was wondering if we were going to meet as a group to discuss our responses or if you and Jeremy would edit them and then send them forward to Kristin and Janet?

Thanks!

Jocelyn

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Tuesday, October 9, 2018 10:21 AM

To: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>

Subject: RE: PRR Comments and Responses

(b)(5)

(b)(5)

Please add your comments and responses to [this sheet](#)

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

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Sent: Friday, October 5, 2018 3:52 PM

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Subject: PRR Comments and Responses

When: Tuesday, October 9, 2018 10:30 AM-12:00 PM (UTC-05:00) Eastern Time (US & Canada).

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 - 12) Rights - Jocelyn
 - 13) Financial Impact to Providers: Jerimiah
 - 14) Negative Financial Impact to States
 - 15) Significant Impact: Hamilton
- Out of Scope – Questions Tab : Chris

From: [Brown, Sharon J. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Re: PRR Comments and Responses
Date: Tuesday, October 16, 2018 2:34:23 PM

OK, thanks!

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, October 16, 2018 2:30:27 PM
To: Brown, Sharon J. (CMS/CMCS)
Subject: RE: PRR Comments and Responses

Hey Sharon,

We had issues with the call-in number, but we have another meeting at 3pm.

Thank you,

Chris Thompson
Deputy Division Director
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From: Brown, Sharon J. (CMS/CMCS)
Sent: Tuesday, October 16, 2018 1:05 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: Re: PRR Comments and Responses

Hi -- is this call still happening? Thanks.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, October 15, 2018 4:55 PM
To: Thompson, Christopher C. (CMS/CMCS); Sabir, Jerimiah A. (CMS/CMCS); Mikow, Asher S. (CMS/CMCS); Lyles, Tia (CMS/CMCS); Ihrig, Jocelyn B. (CMS/CMCS); Brown, Sharon J. (CMS/CMCS);

Johns, Hamilton J. (CMS/CMCS)

Subject: PRR Comments and Responses

When: Tuesday, October 16, 2018 1:00 PM-2:00 PM.

Where: My Office

DO NOT DELETE OR CHANGE ANY OF THE TEXT BELOW THIS LINE

CHRISTOPHER THOMPSON has scheduled this WebEx meeting.

PRR Comments and Responses

Host: CHRISTOPHER THOMPSON

Access Information

1. Please call the following number:

WebEx: (b)(5)

2. Follow the instructions you hear on the phone.

Your WebEx Meeting Number: (b)(5)

=====

To join from a Cisco VoIP enabled CMS Region or from CMS Central Office

1. Dial ext. (b)(5)

Enter Meeting Number: Use Meeting WebEx Number provided above.

=====

To join this meeting online

1. Go to (b)(5)

(b)(5)

2. If requested, enter your name and email address.

3. If a password is required, enter the meeting password: (This meeting does not require a password.)

4. Click "Join".

5. Follow the instructions that appear on your screen.

+++++

This meeting may be recorded by the host. If you have questions, please contact the host.

+++++

Hosts, need your host access code or key? Go to the meeting information page:

(b)(5)

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The meetings.cms.gov team

From: [Brown, Sharon J. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Re: PRR Comments and Responses
Date: Tuesday, October 9, 2018 7:50:56 PM

Just FYI, since we spoke about it, here's the draft comment/response I prepared for my assigned theme (which is included in the SharePoint doc):

(b)(5)

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Tuesday, October 9, 2018 10:21:16 AM

To: Brown, Sharon J. (CMS/CMCS); Lyles, Tia (CMS/CMCS); Mikow, Asher S. (CMS/CMCS); Sabir, Jeremiah A. (CMS/CMCS); Ihrig, Jocelyn B. (CMS/CMCS); Johns, Hamilton J. (CMS/CMCS)

Subject: RE: PRR Comments and Responses

(b)(5)

Please add your comments and responses to [this sheet](#)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
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Baltimore, MD 21244
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-----Original Appointment-----

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Friday, October 5, 2018 3:52 PM

To: Thompson, Christopher C. (CMS/CMCS); Brown, Sharon J. (CMS/CMCS); Lyles, Tia (CMS/CMCS); Mikow, Asher S. (CMS/CMCS); Sabir, Jerimiah A. (CMS/CMCS); Ihrig, Jocelyn B. (CMS/CMCS)

Subject: PRR Comments and Responses

When: Tuesday, October 9, 2018 10:30 AM-12:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: Independent Drafting of Responses

Assignments for Responses

Please flesh out the Comments and the Response for the following topics:

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 - 2) General Harm: Jocelyn
 - 3) Admin Burden: Hamilton
 - 4) Reduce State Flexibility: Asher
 - 5) Self-Direction - Tia
 - 6) 30 day Comment Period/Economic Analysis - Hamilton
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 - 12) Rights - Jocelyn
 - 13) Financial Impact to Providers: Jerimiah
 - 14) Negative Financial Impact to States
 - 15) Significant Impact: Hamilton
- Out of Scope – Questions Tab : Chris

From: [Johns, Hamilton J. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: PRR Comments and Themes
Date: Tuesday, October 16, 2018 10:44:57 AM

Hey Chris. I just wrapped up a SPA call that I scheduled on Friday. I'll be over in a few minutes

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, October 16, 2018 10:42 AM
To: Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>
Subject: PRR Comments and Themes

Hey Hamilton,

Are you in the office today? We are in
C4-20-02.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
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Centers for Medicare & Medicaid Services
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From: [Fan, Kristin A. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#)
Subject: RE: PRR Final Rule
Date: Friday, October 19, 2018 2:12:30 PM

Thanks.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Friday, October 19, 2018 12:15 PM
To: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: PRR Final Rule

Hi Kristin and Janet,

Attached are clean and tracked-changes copies of the final rule with your edits implemented.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: [Freeze, Janet G. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Cc: [Fan, Kristin A. \(CMS/CMCS\)](#)
Subject: RE: PRR OGC comments 42 CFRF (b)(5)
Date: Tuesday, November 27, 2018 5:24:24 PM

Exactly!

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, November 27, 2018 4:55 PM
To: Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Subject: RE: PRR OGC comments 42 CFRF (b)(5)

(b)(5)

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
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From: Freeze, Janet G. (CMS/CMCS)
Sent: Tuesday, November 27, 2018 4:52 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Subject: Fwd: PRR OGC comments 42 CFRF (b)(5)

Let's talk tomorrow. (b)(5)

Sent from my iPhone

Begin forwarded message:

From: "Farrell, Caroline (HHS/OGC)" <Caroline.Farrell@hhs.gov>

Date: November 27, 2018 at 4:47:07 PM EST

To: "Thompson, Christopher C. (CMS/CMCS)" <Christopher.Thompson@cms.hhs.gov>, "Popp, Dawn (HHS/OGC)" <Dawn.Popp@hhs.gov>, "Brown, Sharon J. (CMS/CMCS)" <Sharon.Brown@cms.hhs.gov>, "Ihrig, Jocelyn B. (CMS/CMCS)" <Jocelyn.Ihrig@cms.hhs.gov>, "Johns, Hamilton J. (CMS/CMCS)" <Hamilton.Johns@cms.hhs.gov>, "Lyles, Tia (CMS/CMCS)" <Tia.Lyles@cms.hhs.gov>, "Mikow, Asher S. (CMS/CMCS)" <Asher.Mikow@cms.hhs.gov>, "Sabir, Jeremiah A. (CMS/CMCS)" <Jeremiah.Sabir@cms.hhs.gov>, "Silanskis, Jeremy D. (CMS/CMCS)" <Jeremy.Silanskis@cms.hhs.gov>
Cc: "Boston, Beverly A. (CMS/CMCS)" <Beverly.Boston@cms.hhs.gov>, "Freeze, Janet G. (CMS/CMCS)" <Janet.Freeze@cms.hhs.gov>, "Fan, Kristin A. (CMS/CMCS)" <Kristin.Fan@cms.hhs.gov>

Subject: RE: PRR OGC comments 42 CFRF

(b)(5)

(b)(5)

Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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From: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Sent: Tuesday, November 27, 2018 4:39 PM

To: Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jeremiah A.

(CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS)
<Jeremy.Silanskis@cms.hhs.gov>

Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G.
(CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS)
<Kristin.Fan@cms.hhs.gov>

Subject: PRR OGC comments 42 CFRF (b)(5)

Hi Caroline and Dawn,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
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Centers for Medicare & Medicaid Services
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Cc: [Boston, Beverly A. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#)
Subject: RE: PRR OGC comments 42 CFRF (b)(5)
Date: Wednesday, November 28, 2018 4:27:00 PM

Hi Caroline and Dawn,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
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From: Farrell, Caroline (HHS/OGC)

Sent: Tuesday, November 27, 2018 4:47 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>

Subject: RE: PRR OGC comments 42 CFRF

(b)(5)

(b)(5)

Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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(CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Subject: PRR OGC comments 42 CFRF [REDACTED] (b)(5)

Hi Caroline and Dawn,

[REDACTED] (b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: [REDACTED] (b)(6)
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From: [Fan, Kristin A. \(CMS/CMCS\)](#)
To: [Freeze, Janet G. \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: PRR OGC comments 42 CFRF (b)(5)
Date: Tuesday, November 27, 2018 10:09:10 PM

(b)(5)

From: Freeze, Janet G. (CMS/CMCS)
Sent: Tuesday, November 27, 2018 4:52 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Subject: Fwd: PRR OGC comments 42 CFRF (b)(5)

Let's talk tomorrow

(b)(5)

Sent from my iPhone

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Date: November 27, 2018 at 4:47:07 PM EST
To: "Thompson, Christopher C. (CMS/CMCS)" <Christopher.Thompson@cms.hhs.gov>, "Popp, Dawn (HHS/OGC)" <Dawn.Popp@hhs.gov>, "Brown, Sharon J. (CMS/CMCS)" <Sharon.Brown@cms.hhs.gov>, "Ihrig, Jocelyn B. (CMS/CMCS)" <Jocelyn.Ihrig@cms.hhs.gov>, "Johns, Hamilton J. (CMS/CMCS)" <Hamilton.Johns@cms.hhs.gov>, "Lyles, Tia (CMS/CMCS)" <Tia.Lyles@cms.hhs.gov>, "Mikow, Asher S. (CMS/CMCS)" <Asher.Mikow@cms.hhs.gov>, "Sabir, Jeremiah A. (CMS/CMCS)" <Jeremiah.Sabir@cms.hhs.gov>, "Silanskis, Jeremy D. (CMS/CMCS)" <Jeremy.Silanskis@cms.hhs.gov>
Cc: "Boston, Beverly A. (CMS/CMCS)" <Beverly.Boston@cms.hhs.gov>, "Freeze, Janet G. (CMS/CMCS)" <Janet.Freeze@cms.hhs.gov>, "Fan, Kristin A. (CMS/CMCS)" <Kristin.Fan@cms.hhs.gov>
Subject: RE: PRR OGC comments 42 CFRF (b)(5)

(b)(5)

(b)(5)

Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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From: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Sent: Tuesday, November 27, 2018 4:39 PM

To: Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>

Subject: PRR OGC comments 42 CFRF (b)(5)

Hi Caroline and Dawn,

(b)(5)

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: RE: PRR Team and the DRSF Meeting
Date: Thursday, November 15, 2018 10:41:00 AM

We just bombarded him! LOL I just did the same thing!

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Silanskis, Jeremy D. (CMS/CMCS)
Sent: Thursday, November 15, 2018 10:41 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: PRR Team and the DRSF Meeting

I sent Doug a note to send a cancellation.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Thursday, November 15, 2018 10:40 AM
To: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: PRR Team and the DRSF Meeting

Okay, perfect!

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
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7500 Security Blvd., Mail Stop S3-14-28

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From: Silanskis, Jeremy D. (CMS/CMCS)

Sent: Thursday, November 15, 2018 10:39 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: RE: PRR Team and the DRSF Meeting

Yes, let's cancel. Thanks.

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Thursday, November 15, 2018 10:12 AM

To: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: PRR Team and the DRSF Meeting

Hey Jeremy,

The PRR team will need to meet at 11 to continue to prepare for the 2pm meeting with OGC. Should we cancel the DRSF Weekly meeting?

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

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may result in prosecution to the full extent of the law.

From: [Mikow, Asher S. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: PRR Themes
Date: Wednesday, October 3, 2018 6:42:59 AM

Done, thanks, Asher

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, October 2, 2018 5:04 PM
To: Sabir, Jerimiah A. (CMS/CMCS) <Jerimiah.Sabir@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>
Subject: PRR Themes

Hello All,

Please add your analysis of your PRR themes to [this document](#).

Thank you,

Chris Thompson
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Brown, Sharon J. \(CMS/CMCS\)](#)
Subject: RE: PRR Themes
Date: Thursday, October 4, 2018 8:37:00 AM

Thanks Sharon!

That is not a problem!

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
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Baltimore, MD 21244
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From: Brown, Sharon J. (CMS/CMCS)
Sent: Wednesday, October 3, 2018 5:16 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: Re: PRR Themes

Hi Chris. I'm going to finish adding my checkmarks to the chart tonight (where appropriate), but I'll still need to add any additional themes tomorrow. Thanks.

Sharon Brown | [Administrative Claiming Team](#), Division of Reimbursement and State Financing | [Financial Management Group](#) | [Centers for Medicare & Medicaid Services](#) | ☎: 410-456-7790 | ✉: sharon.brown@cms.hhs.gov

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, October 3, 2018 2:46:59 PM
To: Brown, Sharon J. (CMS/CMCS)
Subject: RE: PRR Themes

You can edit the collapsed themes of the PRR.

Chris Thompson
Deputy Division Director

Division of Reimbursement & State Financing
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7500 Security Blvd., Mail Stop S3-14-28
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From: Brown, Sharon J. (CMS/CMCS)
Sent: Wednesday, October 3, 2018 2:41 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: PRR Themes

Hi Chris. Quick question: Which document are we supposed to be editing? I'm in this SharePoint folder: (b)(5)

Thanks!

Sharon Brown | Administrative Claiming Team, Division of Reimbursement and State Financing | Financial Management Group
| Centers for Medicare & Medicaid Services | 📞: 410-456-7790 | ✉: sharon.brown@cms.hhs.gov

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Popp, Dawn \(HHS/OGC\)](#); [Farrell, Caroline \(HHS/OGC\)](#); [Lyles, Tia \(CMS/CMCS\)](#); [Ihrig, Jocelyn B. \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#); [Johns, Hamilton J. \(CMS/CMCS\)](#); [Brown, Sharon J. \(CMS/CMCS\)](#); [Sabir, Jeremiah A. \(CMS/CMCS\)](#); [Harris, Melissa L. \(CMS/CMCS\)](#); [Lollar, Ralph F. \(CMS/CMCS\)](#); [Cantwell, Kenya J. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: RE: Reassignment of Medicaid Provider Claims (CMS-2413-F) *** OGC Comments ***
Date: Thursday, November 15, 2018 1:00:00 PM

Okay, we can start at 1:15.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Popp, Dawn (HHS/OGC)
Sent: Thursday, November 15, 2018 1:00 PM
To: Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Lyles, Tia (CMS/CMCS) <Tia.Lyles@cms.hhs.gov>; Ihrig, Jocelyn B. (CMS/CMCS) <Jocelyn.Ihrig@cms.hhs.gov>; Mikow, Asher S. (CMS/CMCS) <Asher.Mikow@cms.hhs.gov>; Johns, Hamilton J. (CMS/CMCS) <Hamilton.Johns@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Sabir, Jeremiah A. (CMS/CMCS) <Jeremiah.Sabir@cms.hhs.gov>; Harris, Melissa L. (CMS/CMCS) <Melissa.Harris@cms.hhs.gov>; Lollar, Ralph F. (CMS/CMCS) <Ralph.Lollar@cms.hhs.gov>; Cantwell, Kenya J. (CMS/CMCS) <Kenya.Cantwell@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: Reassignment of Medicaid Provider Claims (CMS-2413-F) *** OGC Comments ***

1:15 is actually better for me as well, if that's possible. Trying to wrap something else up.

From: Farrell, Caroline (HHS/OGC)
Sent: Thursday, November 15, 2018 12:46 PM
To: Thompson, Christopher C. (CMS/CMCS); Lyles, Tia (CMS/CMCS); Ihrig, Jocelyn B. (CMS/CMCS); Mikow, Asher S. (CMS/CMCS); Johns, Hamilton J. (CMS/CMCS); Brown, Sharon J. (CMS/CMCS); Sabir, Jeremiah A. (CMS/CMCS); Popp, Dawn (HHS/OGC); Harris, Melissa L. (CMS/CMCS); Lollar, Ralph F. (CMS/CMCS); Cantwell, Kenya J. (CMS/CMCS); Silanskis, Jeremy D. (CMS/CMCS)

Subject: RE: Reassignment of Medicaid Provider Claims (CMS-2413-F) *** OGC Comments ***

I am may need to be 15 minutes late. Can we start this at 1:15 instead of 1? If so, can you update the appointment, Chris?

Original appointment :

DO NOT DELETE OR CHANGE ANY OF THE TEXT BELOW THIS LINE

CHRISTOPHER THOMPSON has scheduled this WebEx meeting. Reassignment of Medicaid Provider Claims (CMS-2413-F) *** OGC Comments *** Host: CHRISTOPHER THOMPSON Access Information 1. Please call the following number: WebEx: (b)(5)

(b)(5). Follow the instructions you hear on the phone. Your WebEx Meeting Number: (b)(5) ===== To join from a Cisco VoIP enabled CMS Region or from CMS Central Office 1. Dial ext. (b)(5) Enter Meeting Number: Use Meeting WebEx Number provided above. ===== To join this meeting online 1. Go to (b)(5)

(b)(5) 2. If requested, enter your name and email address. 3. If a password is required, enter the meeting password: (This meeting does not require a password.) 4. Click "Join". 5. Follow the instructions that appear on your screen.

+++++ This meeting may be recorded by the host. If you have questions, please contact the host. +++++

+++++ Hosts, need your host access code or key? Go to the meeting information page: +++++

(b)(5) ng the power of collaboration The meetings.cms.gov team

From: [Harris, Melissa L. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Cc: [Lollar, Ralph F. \(CMS/CMCS\)](#); [Cantwell, Kenya J. \(CMS/CMCS\)](#)
Subject: Re: Reassignment of Medicaid Provider Claims (CMS-2413-F) *** OGC Comments ***
Date: Wednesday, November 14, 2018 1:42:17 PM

Hi Chris, Ralph is out tomorrow and I have a meeting conflict for this time. Kenya May have the same conflict.

Sent from my iPhone

> On Nov 14, 2018, at 1:40 PM, Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov> wrote:

>
> ***DO NOT DELETE OR CHANGE ANY OF THE TEXT BELOW THIS LINE***
>
> CHRISTOPHER THOMPSON has scheduled this WebEx meeting.
>
> Reassignment of Medicaid Provider Claims (CMS-2413-F) *** OGC Comments ***
> Host: CHRISTOPHER THOMPSON

>
> Access Information
> 1. Please call the following number:
> WebEx: (b)(5)
> 2. Follow the instructions you hear on the phone.

>
> Your WebEx Meeting Number: (b)(5)
>
> =====

>
>
>
> To join from a Cisco VoIP enabled CMS Region or from CMS Central Office

>
> 1. Dial ext. (b)(5)
> Enter Meeting Number: Use Meeting WebEx Number provided above.

>
> =====
> To join this meeting online

> 1. Go to (b)(5)
> 2. If requested, enter your name and email address.
> 3. If a password is required, enter the meeting password: (This meeting does not require a password.)
> 4. Click "Join".
> 5. Follow the instructions that appear on your screen.

>
> ++++++
> This meeting may be recorded by the host. If you have questions, please contact the host.

> ++++++
>
>
> Hosts, need your host access code or key? Go to the meeting information page:

> (b)(5)

>
> Delivering the power of collaboration
> The meetings.cms.gov team

>
>

>
>
>
> <meeting.ics>

From: [Brooks, Gaysha M. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Cc: [Brewer, Annette M. \(CMS/OSORA\)](#); [Laib, Eric C. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#)
Subject: RE: Request for clearance CMS-2413-P; Medicaid Program; Reassignment of Medicaid Provider Claims
Date: Friday, April 6, 2018 11:32:48 AM

Yes

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Friday, April 6, 2018 11:28 AM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>
Subject: RE: Request for clearance CMS-2413-P; Medicaid Program; Reassignment of Medicaid Provider Claims

Hi Gaysha,

I was just about to send you an iteration of the rule which combined both Eric's and OGC's edits. I am assuming I should hold off on sending that to you as well?

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: Brooks, Gaysha M. (CMS/OSORA)
Sent: Friday, April 6, 2018 11:26 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <[AMERICAN
OVERSIGHT](mailto:Cynthia.Lambert-</p></div><div data-bbox=)

Lawson@cms.hhs.gov>

Subject: RE: Request for clearance CMS-2413-P; Medicaid Program; Reassignment of Medicaid Provider Claims

Hi Chris,

The rule was circulated yesterday for reclearance so please hold these changes for the next round.

Thanks

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Friday, April 6, 2018 11:12 AM

To: CMS Coordination_Regs_OSORA <Coordination_Regs_OSORA@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>

Subject: RE: Request for clearance CMS-2413-P; Medicaid Program; Reassignment of Medicaid Provider Claims

Please see the attached which addresses Eric's comments.

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

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From: CMS Coordination_Regs_OSORA

Sent: Monday, April 2, 2018 6:34 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: FW: Request for clearance CMS-2413-P; Medicaid Program; Reassignment of Medicaid Provider Claims

From: Laib, Eric C. (CMS/OSORA)

Sent: Friday, March 30, 2018 4:45 PM

To: CMS Coordination_Regs_OSORA <Coordination_Regs_OSORA@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Cc: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>

Subject: RE: Request for clearance CMS-2413-P; Medicaid Program; Reassignment of Medicaid Provider Claims

Comments attached. Please let me know if there are any questions.

Eric

Eric C. Laib

Division of Regulations Management and Impact Analysis

Regulations Development Group

Office of Strategic Operations & Regulatory Affairs, CMS

Office: 410-786-9759 | Mobile/ADS: (b)(6) Eric.Laib2@cms.hhs.gov

From: CMS Coordination_Regs_OSORA

Sent: Tuesday, March 27, 2018 3:42 PM

To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: Request for clearance CMS-2413-P; Medicaid Program; Reassignment of Medicaid Provider Claims

Importance: High

Please note: This clearance is now requested by Friday, March 30th. Sorry for any inconvenience.

Clearance is requested by Wednesday, April 4, 2018.

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If you have any questions regarding submission of clearances and comments, you may contact Cynthia Lambert-Lawson **(6-1366)**. Please call Chris Thompson **(6-4044)** for policy related questions.

This proposed rule is scheduled for publication on June 22, 2018. Therefore, it is important that we receive all clearances timely. Thank you, in advance, for your prompt response.

From: [Zhang, Nancy N. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Date: Monday, December 3, 2018 1:49:42 PM

Hi Chris,

Thanks for your call. I was assigned to this rule since Eric left OSORA. The RIA in this draft final rule has little change from the published proposed rule. To make things moving more smoothly, please disregard my 2 comments which are not essential.

Please let me if you have any questions.

Thanks

Nancy

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, December 3, 2018 11:46 AM
To: Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>
Subject: RE: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Nancy,

Do you have a couple of minutes to talk? I have a couple of questions regarding your comments on 2413-F.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: CMS Coordination_Regs_OSORA

Sent: Wednesday, October 31, 2018 10:25 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: FW: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

From: Zhang, Nancy N. (CMS/OSORA)

Sent: Wednesday, October 31, 2018 10:08 AM

To: CMS Coordination_Regs_OSORA <Coordination_Regs_OSORA@cms.hhs.gov>

Subject: RE: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

[My comments on RIA is attached.](#)

[Thanks](#)

From: CMS Coordination_Regs_OSORA

Sent: Tuesday, October 23, 2018 5:06 PM

To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; CMS OLClearances <OLClearances@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

CMS-2413-F: Medicaid Program; Reassignment of Medicaid Provider Claims

Clearance is requested by 5 p.m., Tuesday, October 30, 2018.

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From: [Zhang, Nancy N. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Date: Monday, December 3, 2018 12:00:06 PM

Sure. I am at my desk now, 410-786-8715

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, December 3, 2018 11:46 AM
To: Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>
Subject: RE: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Nancy,

Do you have a couple of minutes to talk? I have a couple of questions regarding your comments on 2413-F.

Thank you,

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Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
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7500 Security Blvd., Mail Stop S3-14-28
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<Caroline.Farrell@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: FW: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

From: Zhang, Nancy N. (CMS/OSORA)

Sent: Wednesday, October 31, 2018 10:08 AM

To: CMS Coordination_Regs_OSORA <Coordination_Regs_OSORA@cms.hhs.gov>

Subject: RE: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

My comments on RIA is attached.

Thanks

From: CMS Coordination_Regs_OSORA

Sent: Tuesday, October 23, 2018 5:06 PM

To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; CMS OLClearances <OLClearances@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

CMS-2413-F: Medicaid Program; Reassignment of Medicaid Provider Claims

Clearance is requested by 5 p.m., Tuesday, October 30, 2018.

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Zhang, Nancy N. \(CMS/OSORA\)](#)
Subject: RE: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Date: Monday, December 3, 2018 11:45:00 AM

Hi Nancy,

Do you have a couple of minutes to talk? I have a couple of questions regarding your comments on 2413-F.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Subject: FW: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

From: Zhang, Nancy N. (CMS/OSORA)

Sent: Wednesday, October 31, 2018 10:08 AM

To: CMS Coordination_Regs_OSORA <Coordination_Regs_OSORA@cms.hhs.gov>

Subject: RE: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

My comments on RIA is attached.

Thanks

From: CMS Coordination_Regs_OSORA

Sent: Tuesday, October 23, 2018 5:06 PM

To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; CMS CMSO_REGS <CMSCMSO_REGS@cms.hhs.gov>; CMS OLClearances <OLClearances@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

CMS-2413-F: Medicaid Program; Reassignment of Medicaid Provider Claims

Clearance is requested by 5 p.m., Tuesday, October 30, 2018.

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From: [Zhang, Nancy N. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Date: Monday, December 3, 2018 1:51:43 PM

No problem.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, December 3, 2018 1:51 PM
To: Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>
Subject: RE: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Okay, perfect!

Thank you for your quick response!

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
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From: Zhang, Nancy N. (CMS/OSORA)
Sent: Monday, December 3, 2018 1:50 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Chris,

Thanks for your call. I was assigned to this rule since Eric left OSORA. The RIA in this draft final rule has little change from the published proposed rule. To make things moving more smoothly, please disregard my 2 comments which are not essential.

Please let me if you have any questions.

Thanks

Nancy

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Monday, December 3, 2018 11:46 AM
To: Zhang, Nancy N. (CMS/OSORA) <Nancy.Zhang@cms.hhs.gov>
Subject: RE: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Hi Nancy,

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Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: FW: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

From: Zhang, Nancy N. (CMS/OSORA)

Sent: Wednesday, October 31, 2018 10:08 AM

To: CMS Coordination_Regs_OSORA <Coordination_Regs_OSORA@cms.hhs.gov>

Subject: RE: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

My comments on RIA is attached.

Thanks

From: CMS Coordination_Regs_OSORA

Sent: Tuesday, October 23, 2018 5:06 PM

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Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

CMS-2413-F: Medicaid Program; Reassignment of Medicaid Provider Claims

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To: [Zhang, Nancy N. \(CMS/OSORA\)](#)
Subject: RE: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)
Date: Monday, December 3, 2018 1:50:00 PM

Okay, perfect!

Thank you for your quick response!

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Subject: FW: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

From: Zhang, Nancy N. (CMS/OSORA)

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Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>

Subject: Request for Clearance: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-F)

Importance: High

CMS-2413-F: Medicaid Program; Reassignment of Medicaid Provider Claims

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From: [Barco, Evell J. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Re: Request for Reclearance of CMS-2413-P Reassignment of Medicaid Provider Claims
Date: Friday, April 6, 2018 12:46:36 PM

CMS clr is due Apr 12 but the 13th for HHS since the Dept accepted it for clr a day later.

Sent from my iPhone

On Apr 6, 2018, at 11:56 AM, Thompson, Christopher C. (CMS/CMCS)
<Christopher.Thompson@cms.hhs.gov> wrote:

FYI

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Boston, Beverly A. (CMS/CMCS)
Sent: Friday, April 6, 2018 11:41 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>
Subject: FW: Request for Reclearance of CMS-2413-P Reassignment of Medicaid Provider Claims

Hi Chris,

As OSORA mentioned in a recent email, see below the PPR rule is in CMS re-clearance with a due date of 4/12.

Beverly

From: CMS Coordination_Regs_OSORA
Sent: Thursday, April 5, 2018 10:29 AM
To: CMS - Reg_Coordinators <Reg_Coordinators@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Subject: Request for Reclearance of CMS-2413-P Reassignment of Medicaid Provider Claims

CMS-2413-P; Medicaid Program; Reassignment of Medicaid Provider Claims

Re-Clearance requested by **Thursday, April 12, 2018.**

REMINDER: This information has not been publicly disclosed and may be privileged and confidential. **It is for internal government use only** and must not be disseminated, distributed, or copied to persons not authorized to receive the information. Unauthorized disclosure may result in prosecution to the full extent of the law.

This proposed rule is scheduled for release by June 22, 2018. Therefore, we are requesting only substantive comments/clearances by the requested due date.

(b)(5)

Please forward your responses to the **CMS Coordination_Regs_OSORA Outlook mailbox** by **Thursday, April 12, 2018.**

If you have any questions regarding submission of clearances and comments, you may contact Cynthia Lambert-Lawson (**6-1366**). Please call Chris Thompson (**6-4044**) for policy related questions.

This proposed rule is scheduled for publication on June 22, 2018. Therefore, it is important that we receive all clearances timely. Thank you, in advance, for your prompt response.

<CMS-2413-P ClearanceRegs (04-05-18).doc>

<CMS-2413-P_Master_(04-05-18).docx>

<CMS-2413-P_Compare 4-5-18 to 3-23-18.docx>

From: [Barco, Evell J. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Farrell, Caroline \(HHS/OGC\)](#); [Brewer, Annette M. \(CMS/OSORA\)](#); [Brooks, Gaysha M. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#); [Bryman, Mitch \(CMS/OSORA\)](#); [Laib, Eric C. \(CMS/OSORA\)](#)
Cc: [Clybourn, Olen D. \(CMS/OSORA\)](#); [Phan, Thomas M. \(CMS/OSORA\)](#); [Jones, Martique S. \(CMS/OSORA\)](#); [Harris, Sheli E. \(CMS/OSORA\)](#); [Lafferty, Tiffany R. \(CMS/OSORA\)](#); [Hubbard, Lisa A. \(CMS/OSORA\)](#); [Miller, Ruth A. \(CMS/OSORA\)](#); [Garcia, Vanessa \(CMS/OSORA\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Khan, Farooq A. \(CMS/OSORA\)](#)
Subject: RE: Status of HHS cmmts: Reassignment of Medicaid Provider Claims (CMS-2413-P)
Date: Wednesday, April 18, 2018 8:47:26 AM

Correction regarding ASL. We are expecting substantive ASL comments and I am following up regarding an ETA. Thanks

From: Barco, Evell J. (CMS/OSORA)
Sent: Tuesday, April 17, 2018 4:19 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>
Cc: Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: Status of HHS cmmts: OGC comments- Reassignment of Medicaid Provider Claims (CMS-2413-P)

Status of HHS comments: Reassignment of Medicaid Provider Claims

HHS comments were due Apr 13.

Comments: ACL non-concurrence, ASPE, ASFR, **OGC attached.**

Pending: ASL—We will move on w/o their response.

Concurrences: SAMHSA, OIG, OCR, IHS, HRSA, DAB, IEA

From: Barco, Evell J. (CMS/OSORA)
Sent: Friday, April 13, 2018 11:22 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>
Cc: Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>;

Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>

Subject: status of HHS cmmts: ACL non-concurrence, ASPE, ASFR- Reassignment of Medicaid Provider Claims (CMS-2413-P)

Status of HHS comments: Reassignment of Medicaid Provider Claims

HHS comments are due today, April 13.

Comments: ACL non-concurrence, ASPE, ASFR.

Pending: OGC, IEA, ASL.

Concurrences: SAMHSA, OIG, OCR, IHS, HRSA, DAB

Please note:

OGC is reviewing the 4/5 version(current draft) and is expected to comment today, 4/13.

Inadvertently, the other reviewing offices received and reviewed an earlier version (dated 3-23).

When comments come in please review for relevance to the newest draft, with deference to the OGC edits on the newer draft, as well.

Contact me if you have questions or need clarification.

Thanks.

From: Brewer, Annette M. (CMS/OSORA)

Sent: Thursday, April 5, 2018 10:44 AM

To: Shelton, Carrie A (HHS/IOS) <Carrie.Shelton@HHS.GOV>

Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Wilson, Lynette N. (CMS/OSORA) <Lynette.Wilson@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Phan, Thomas M.(CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS 2413-P)—ADVANCE REGULATION

Importance: High

SUBJECT: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-P)—**ADVANCE REGULATION**

(b)(5)

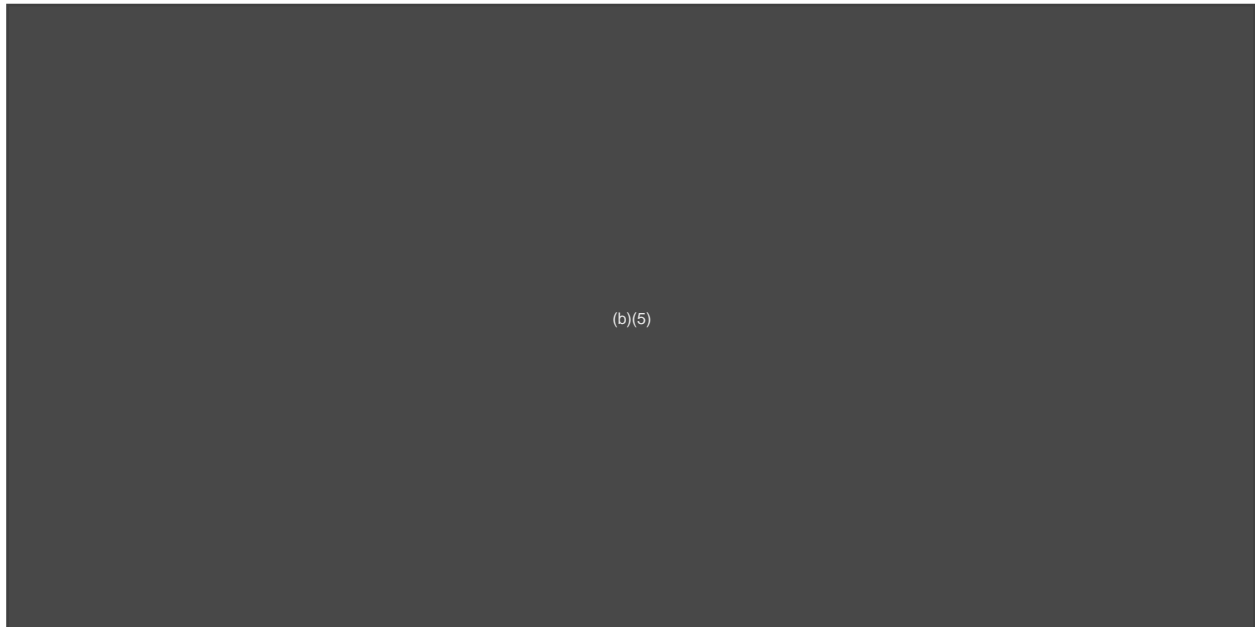
Thank you for your help in expediting the publication of this proposed rule.

Attachments:

From: [Brewer, Annette M. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Brown, Sharon J. \(CMS/CMCS\)](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#); [Brooks, Gaysha M. \(CMS/OSORA\)](#)
Subject: RE: status of HHS cmmts: ACL non-concurrence- Reassignment of Medicaid Provider Claims (CMS-2413-P)
Date: Thursday, April 19, 2018 8:30:07 AM

Also need responses to these ASFR comments.

ASFR



I am in training until 11:30 so please reach out to Gaysha if you have any questions.
Thanks,

Annette M. Brewer 



410-786-6580

(b)(6)

ADS on Mondays

From: Brewer, Annette M. (CMS/OSORA)
Sent: Thursday, April 19, 2018 8:17 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>
Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Subject: RE: status of HHS cmmts: ACL non-concurrence- Reassignment of Medicaid Provider Claims (CMS-2413-P)

Good morning,
Please provide responses for the following ASL and ASPE comments.
Thanks,

ASL

Page 554 redacted for the following reason:

(b)(5), internal, predecisional

Annette M. Brewer 



410-786-6580

(b)(6)

ADS on Mondays

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Wednesday, April 18, 2018 4:26 PM

To: Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Cc: Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>

Subject: RE: status of HHS cmmts: ACL non-concurrencee- Reassignment of Medicaid Provider Claims (CMS-2413-P)

Good Afternoon All,

Please see the attached responses to ACL's edits.

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

Mobile: (b)(6)

Fax: (410) 786-8533

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From: Barco, Evell J. (CMS/OSORA)

Sent: Friday, April 13, 2018 11:22 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>

Cc: Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA)

<Thomas.Phan@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>

Subject: status of HHS cmmts: ACL non-concurrence, ASPE, ASFR- Reassignment of Medicaid Provider Claims (CMS-2413-P)

Status of HHS comments: Reassignment of Medicaid Provider Claims

HHS comments are due today, April 13.

Comments: ACL non-concurrence, ASPE, ASFR.

Pending: OGC, IEA, ASL.

Concurrences: SAMHSA, OIG, OCR, IHS, HRSA, DAB

Please note:

OGC is reviewing the 4/5 version(current draft) and is expected to comment today, 4/13.

Inadvertently, the other reviewing offices received and reviewed an earlier version (dated 3-23).

When comments come in please review for relevance to the newest draft, with deference to the OGC edits on the newer draft, as well.

Contact me if you have questions or need clarification.

Thanks.

From: Brewer, Annette M. (CMS/OSORA)

Sent: Thursday, April 5, 2018 10:44 AM

To: Shelton, Carrie A (HHS/IOS) <Carrie.Shelton@HHS.GOV>

Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Wilson, Lynette N. (CMS/OSORA) <Lynette.Wilson@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Phan, Thomas M.(CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS 2413-P)—ADVANCE REGULATION

Importance: High

SUBJECT: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-P)—**ADVANCE REGULATION**

(b)(5)

Thank you for your help in expediting the publication of this proposed rule.

Attachments:

From: [Brooks, Gaysha M. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Cc: [Brewer, Annette M. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#)
Subject: RE: Status of HHS cmmts: OGC comments- Reassignment of Medicaid Provider Claims (CMS-2413-P)
Date: Wednesday, April 18, 2018 4:04:49 PM

Hi Chris,

In the future, please only send your revisions to Cynthia Lambert-Lawson, Annette Brewer, and myself.

Thanks

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, April 18, 2018 3:52 PM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>
Cc: Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: Status of HHS cmmts: OGC comments- Reassignment of Medicaid Provider Claims (CMS-2413-P)

Hi Evell,

Attached is a clean and "tracked-changes" version of CMS-2413-P with OGC's edits accepted and additional language and a question/comment to be addressed by OGC.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)

Fax: (410) 786-8533

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Sent: Tuesday, April 17, 2018 4:18 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>
Cc: Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: Status of HHS cmmts: OGC comments- Reassignment of Medicaid Provider Claims (CMS-2413-P)

Status of HHS comments: Reassignment of Medicaid Provider Claims

HHS comments were due Apr 13.

Comments: ACL non-concurrence, ASPE, ASFR, **OGC attached.**

Pending: ASL—We will move on w/o their response.

Concurrences: SAMHSA, OIG, OCR, IHS, HRSA, DAB, IEA

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Sent: Friday, April 13, 2018 11:22 AM

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<Vanessa.Garcia@cms.hhs.gov>

Subject: status of HHS cmmts: ACL non-concurrence, ASPE, ASFR- Reassignment of Medicaid Provider Claims (CMS-2413-P)

Status of HHS comments: Reassignment of Medicaid Provider Claims

HHS comments are due today, April 13.

Comments: ACL non-concurrence, ASPE, ASFR.

Pending: OGC, IEA, ASL.

Concurrences: SAMHSA, OIG, OCR, IHS, HRSA, DAB

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Thanks.

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Sent: Thursday, April 5, 2018 10:44 AM

To: Shelton, Carrie A (HHS/IOS) <Carrie.Shelton@HHS.GOV>

Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Wilson, Lynette N. (CMS/OSORA) <Lynette.Wilson@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Phan, Thomas M.(CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS 2413-P)—ADVANCE REGULATION

Importance: High

SUBJECT: Medicaid Program; Reassignment of Medicaid Provider Claims (CMS-2413-P)—ADVANCE REGULATION

(b)(5)

Thank you for your help in expediting the publication of this proposed rule.

Attachments:

From: [Brewer, Annette M. \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Cc: [Brooks, Gaysha M. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#)
Subject: RE: Update on CMS-2413-P
Date: Wednesday, April 18, 2018 11:03:06 AM

We are being asked by HHS for the revised rule. Please let me know when you expect to send so we can provide the eta.

Thanks,

Annette M. Brewer 



410-786-6580 /

(b)(6)

ADS on Mondays

From: Lambert-Lawson, Cynthia (CMS/OSORA)
Sent: Wednesday, April 18, 2018 8:36 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Subject: Update on CMS-2413-P

Good Morning Christopher,

CMS and HHS clearance is complete. During this round, we received comments from ACL, ASPE, ASFR, and OGC. We did not rec'd clearance from ASL. At this time, we can move the revised rule without ACL clearance.

Attached is the "Response to HHS Comments" list based on HHS comments rec'd. Also, attached is the latest "Master" document to incorporate all revisions.

To update management, *when can we expect to receive the revised documents (rule and response to comments) based on this round of clearances?*

Cynthia P. Lambert-Lawson

Centers for Medicare & Medicaid Services
DHHS/CMS/OSORA
Office: C5-12-16
Phone: (410) 786-1366
ADS phone: (b)(6) Monday & Tuesday
Email: Cynthia.Lambert-Lawson@cms.hhs.gov

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Lyles, Tia \(CMS/CMCS\)](#); [Ihrig, Jocelyn B. \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#); [Johns, Hamilton J. \(CMS/CMCS\)](#); [Brown, Sharon J. \(CMS/CMCS\)](#); [Sabir, Jeremiah A. \(CMS/CMCS\)](#); [Farrell, Caroline \(HHS/OGC\)](#); [Popp, Dawn \(HHS/OGC\)](#); [Harris, Melissa L. \(CMS/CMCS\)](#); [Lollar, Ralph F. \(CMS/CMCS\)](#); [Cantwell, Amy \(IHS/OKC/CLA\)](#); [Cantwell, Kenya J. \(CMS/CMCS\)](#); [CMS S and C Training](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: Reassignment of Medicaid Provider Claims (CMS-2413-F) *** OGC Comments ***

DO NOT DELETE OR CHANGE ANY OF THE TEXT BELOW THIS LINE

CHRISTOPHER THOMPSON has scheduled this WebEx meeting.

Reassignment of Medicaid Provider Claims (CMS-2413-F) *** OGC Comments ***
Host: CHRISTOPHER THOMPSON

Access Information

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Lyles, Tia \(CMS/CMCS\)](#); [Ihrig, Jocelyn B. \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#); [Johns, Hamilton J. \(CMS/CMCS\)](#); [Brown, Sharon J. \(CMS/CMCS\)](#); [Sabir, Jeremiah A. \(CMS/CMCS\)](#); [Farrell, Caroline \(HHS/OGC\)](#); [Popp, Dawn \(HHS/OGC\)](#); [Harris, Melissa L. \(CMS/CMCS\)](#); [Lollar, Ralph F. \(CMS/CMCS\)](#); [Cantwell, Amy \(IHS/OKC/CLA\)](#); [Cantwell, Kenya J. \(CMS/CMCS\)](#); [CMS S and C Training](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: Reassignment of Medicaid Provider Claims (CMS-2413-F) *** OGC Comments ***

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CHRISTOPHER THOMPSON has scheduled this WebEx meeting.

Reassignment of Medicaid Provider Claims (CMS-2413-F) *** OGC Comments ***
Host: CHRISTOPHER THOMPSON

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From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Lyles, Tia \(CMS/CMCS\)](#); [Ihrig, Jocelyn B. \(CMS/CMCS\)](#); [Mikow, Asher S. \(CMS/CMCS\)](#); [Johns, Hamilton J. \(CMS/CMCS\)](#); [Brown, Sharon J. \(CMS/CMCS\)](#); [Sabir, Jeremiah A. \(CMS/CMCS\)](#); [Farrell, Caroline \(HHS/OGC\)](#); [Popp, Dawn \(HHS/OGC\)](#); [Harris, Melissa L. \(CMS/CMCS\)](#); [Lollar, Ralph F. \(CMS/CMCS\)](#); [Cantwell, Amy \(IHS/OKC/CLA\)](#); [Cantwell, Kenya J. \(CMS/CMCS\)](#); [CMS S and C Training](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: Reassignment of Medicaid Provider Claims (CMS-2413-F) *** OGC Comments ***

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From: [Harris, Melissa L. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Tentative: PRR OGC Comments

From: [Sabir, Jeremiah A. \(CMS/CMCS\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: Tentative: PRR OGC Edits

From: [Barco, Evell J. \(CMS/OSORA\)](#)
To: [Ritchie, Vu \(CMS/OA\)](#); [Perez-Rivera, Diana \(CMS/OA\)](#); [Brookes, Brady \(CMS/OA\)](#); [Maresca, Andrea \(CMS/CMCS\)](#); [Dunn, Victoria \(CMS/CMCS\)](#); [Teal, Lela \(CMS/CMCS\)](#); [Nelson, Barbara A. \(CMS/CMCS\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Cc: [Cantwell, Kathleen M. \(CMS/OSORA\)](#); [Phan, Thomas M. \(CMS/OSORA\)](#); [Miller, Ruth A. \(CMS/OSORA\)](#); [Jones, Martique S. \(CMS/OSORA\)](#); [Neale, Brian \(CMS/CMCS\)](#); [Hill, Timothy B. \(CMS/CMCS\)](#); [Gifford, Deidre S. \(CMS/CMCS\)](#); [MacCarroll, Amber L. \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: Medicaid Access to Care Exemptions -EOP Policy Call
Date: Thursday, February 1, 2018 9:51:23 AM
Importance: High

EOP has offered Feb 7 @ 4 pm. Please confirm your availability please.

From: Barco, Evell J. (CMS/OSORA)
Sent: Wednesday, January 31, 2018 4:18 PM
To: Ritchie, Vu (CMS/OA) <vu.ritchie@cms.hhs.gov>; Perez-Rivera, Diana (CMS/OA) <diana.perez-rivera@cms.hhs.gov>; Brookes, Brady (CMS/OA) <Brady.Brookes@cms.hhs.gov>; Maresca, Andrea (CMS/CMCS) <andrea.maresca@cms.hhs.gov>; Dunn, Victoria (CMS/CMCS) <Victoria.Dunn@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Nelson, Barbara A. (CMS/CMCS) <Barbara.Nelson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Cantwell, Kathleen M. (CMS/OSORA) <Kathleen.Cantwell@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Neale, Brian (CMS/CMCS) <brian.neale@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; MacCarroll, Amber L. (CMS/CMCS) <Amber.MacCarroll@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: Medicaid Access to Care Exemptions -EOP Policy Call

Hello all,

We have learned that neither of the times we offered will work for EOP. We now working to confirm times for Feb 6. Please stay tuned.

From: Barco, Evell J. (CMS/OSORA)
Sent: Wednesday, January 31, 2018 11:21 AM
To: Ritchie, Vu (CMS/OA) <vu.ritchie@cms.hhs.gov>; Perez-Rivera, Diana (CMS/OA) <diana.perez-rivera@cms.hhs.gov>; Bennett, Jason (CMS/OA) <jason.bennett@cms.hhs.gov>; DiBlasio, Carla (CMS/OA) <carla.diblasio@cms.hhs.gov>; Brookes, Brady (CMS/OA) <Brady.Brookes@cms.hhs.gov>; Miranda-Marin, Eric (HHS/IOS) <Eric.Miranda-marin@hhs.gov>; Maresca, Andrea (CMS/CMCS) <andrea.maresca@cms.hhs.gov>; Dunn, Victoria (CMS/CMCS) <Victoria.Dunn@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Nelson, Barbara A. (CMS/CMCS) <Barbara.Nelson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Cantwell, Kathleen M. (CMS/OSORA) <Kathleen.Cantwell@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>;

Neale, Brian (CMS/CMCS) <brian.neale@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; MacCarroll, Amber L. (CMS/CMCS) <Amber.MacCarroll@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: Medicaid Access to Care Exemptions -EOP Policy Call

Importance: High

Hello all,

We are working to schedule a senior-level policy call with EOP on the Medicaid Access to Care Rule and have shared the times below. Please confirm who will be attending this call to allow us to share the list with EOP and then block times on calendars ASAP. In addition, we will also need to share a briefing paper. This paper should be short and include a bulleted list highlighting the major provisions of the rule to be discussed. An appointment will follow once EOP confirms availability and paper has been provided. Thank you.

Times:

Friday 4pm-5pm

Monday 4pm-5 pm

From: [Barco, Evell J. \(CMS/OSORA\)](#)
To: [Fan, Kristin A. \(CMS/CMCS\)](#); [Ritchie, Vu \(CMS/OA\)](#); [Perez-Rivera, Diana \(CMS/OA\)](#); [Brookes, Brady \(CMS/OA\)](#); [Maresca, Andrea \(CMS/CMCS\)](#); [Dunn, Victoria \(CMS/CMCS\)](#); [Teal, Lela \(CMS/CMCS\)](#); [Nelson, Barbara A. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Cc: [Cantwell, Kathleen M. \(CMS/OSORA\)](#); [Phan, Thomas M. \(CMS/OSORA\)](#); [Miller, Ruth A. \(CMS/OSORA\)](#); [Jones, Martique S. \(CMS/OSORA\)](#); [Neale, Brian \(CMS/CMCS\)](#); [Hill, Timothy B. \(CMS/CMCS\)](#); [Gifford, Deidre S. \(CMS/CMCS\)](#); [MacCarroll, Amber L. \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: RE: Medicaid Access to Care Exemptions -EOP Policy Call
Date: Wednesday, January 31, 2018 4:19:27 PM

Ok, thanks.

From: Fan, Kristin A. (CMS/CMCS)
Sent: Wednesday, January 31, 2018 4:19 PM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Ritchie, Vu (CMS/OA) <Vu.Ritchie@cms.hhs.gov>; Perez-Rivera, Diana (CMS/OA) <Diana.Perez-Rivera@cms.hhs.gov>; Brookes, Brady (CMS/OA) <Brady.Brookes@cms.hhs.gov>; Maresca, Andrea (CMS/CMCS) <Andrea.Maresca@cms.hhs.gov>; Dunn, Victoria (CMS/CMCS) <Victoria.Dunn@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Nelson, Barbara A. (CMS/CMCS) <Barbara.Nelson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Cantwell, Kathleen M. (CMS/OSORA) <Kathleen.Cantwell@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Neale, Brian (CMS/CMCS) <Brian.Neale@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; MacCarroll, Amber L. (CMS/CMCS) <Amber.MacCarroll@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: RE: Medicaid Access to Care Exemptions -EOP Policy Call

And we have paper prepared – it is with our Center Director’s office for review.

From: Barco, Evell J. (CMS/OSORA)
Sent: Wednesday, January 31, 2018 4:18 PM
To: Ritchie, Vu (CMS/OA) <Vu.Ritchie@cms.hhs.gov>; Perez-Rivera, Diana (CMS/OA) <Diana.Perez-Rivera@cms.hhs.gov>; Brookes, Brady (CMS/OA) <Brady.Brookes@cms.hhs.gov>; Maresca, Andrea (CMS/CMCS) <Andrea.Maresca@cms.hhs.gov>; Dunn, Victoria (CMS/CMCS) <Victoria.Dunn@cms.hhs.gov>; Teal, Lela (CMS/CMCS) <Lela.Teal@cms.hhs.gov>; Nelson, Barbara A. (CMS/CMCS) <Barbara.Nelson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Cantwell, Kathleen M. (CMS/OSORA) <Kathleen.Cantwell@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Neale, Brian (CMS/CMCS) <Brian.Neale@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; MacCarroll, Amber L. (CMS/CMCS) <Amber.MacCarroll@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
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Cc: Cantwell, Kathleen M. (CMS/OSORA) <Kathleen.Cantwell@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Neale, Brian (CMS/CMCS) <brian.neale@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>; MacCarroll, Amber L. (CMS/CMCS) <Amber.MacCarroll@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: Medicaid Access to Care Exemptions -EOP Policy Call

Importance: High

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Monday 4pm-5 pm

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#)
Cc: [Boston, Beverly A. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Brewer, Annette M. \(CMS/OSORA\)](#)
Subject: RE: Reassignment of Medicaid Provider Claims (CMS 2413-P)--CLEARANCE REQUEST
Date: Monday, July 9, 2018 11:05:00 AM

Hi Cynthia,

I made a slight edit to the sentence below.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Lambert-Lawson, Cynthia (CMS/OSORA)
Sent: Monday, July 9, 2018 6:32 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>
Subject: RE: Reassignment of Medicaid Provider Claims (CMS 2413-P)--CLEARANCE REQUEST

Good Morning Chris,

(b)(5)

From: Brewer, Annette M. (CMS/OSORA)
Sent: Friday, July 6, 2018 1:52 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Barco, Evell J. (CMS/OSORA)

<Evell.Barco@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>

Subject: RE: Reassignment of Medicaid Provider Claims (CMS 2413-P)--CLEARANCE REQUEST

Importance: High

Chris,

(b)(5)

Annette M. Brewer 

 410-786-6580 /  (b)(6) **ADS on Mondays**

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Wednesday, June 27, 2018 10:10 AM

To: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>

Subject: RE: Reassignment of Medicaid Provider Claims (CMS 2413-P)--CLEARANCE REQUEST

Hi Annette,

We are currently awaiting clearance from Calder.

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Brewer, Annette M. (CMS/OSORA)
Sent: Wednesday, June 27, 2018 10:06 AM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>
Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>
Subject: RE: Reassignment of Medicaid Provider Claims (CMS 2413-P)--CLEARANCE REQUEST

Chris,
We are ready to send the revised package back to OMB. Can you confirm that Calder has cleared this version?

Annette M. Brewer 
 410-786-6580 /  (b)(6) **ADS on Mondays**

From: Barco, Evell J. (CMS/OSORA)
Sent: Wednesday, June 27, 2018 8:58 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>
Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>;

Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: Reassignment of Medicaid Provider Claims (CMS 2413-P)--CLEARANCE REQUEST

We have confirmed that no additional comments are expected from OMB.

Chris, Please confirm that Calder clears this version.

Dawn, [REDACTED] (b)(5) If not OS/ES will share it.
Please let me know. Thanks.

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Tuesday, June 26, 2018 5:02 PM

To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Cc: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>

Subject: RE: OMB Passback - Reassignment of Medicaid Provider Claims (CMS 2413-P)--CLEARANCE REQUEST

Hi Annette, Gaysha, and Cynthia,

I am perfectly okay with the minor edits made by OMB. Attached is a pass back with all of OMB edits accepted. Evell requested that this iteration of the proposed be transmitted to [REDACTED] (b)(5). I will defer to you all as far as coordination to make certain [REDACTED] (b)(5) is able to review this iteration of the proposed rule.

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

Mobile: [REDACTED] (b)(6)

Fax: (410) 786-8533

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From: Barco, Evell J. (CMS/OSORA)

Sent: Tuesday, June 26, 2018 4:32 PM

To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>

Subject: OMB Passback - Reassignment of Medicaid Provider Claims (CMS 2413-P)--CLEARANCE REQUEST

Importance: High

Hi,

OMB's passback is attached, with one reviewer outstanding so possibly more to come. These

(b)(5)

Please transmit this to

(b)(5)

Thanks.

From: [Barco, Evell J. \(CMS/OSORA\)](#)
To: [Barco, Evell J. \(CMS/OSORA\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#); [Brewer, Annette M. \(CMS/OSORA\)](#); [Brooks, Gaysha M. \(CMS/OSORA\)](#); [Bryman, Mitch \(CMS/OSORA\)](#); [Clybourn, Olen D. \(CMS/OSORA\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#); [Farrell, Caroline \(HHS/OGC\)](#); [Fultz-Mimms, Trenesha N. \(CMS/OSORA\)](#); [Garcia, Vanessa \(CMS/OSORA\)](#); [Harris, Sheli E. \(CMS/OSORA\)](#); [Hubbard, Lisa A. \(CMS/OSORA\)](#); [Jones, Martique S. \(CMS/OSORA\)](#); [Lafferty, Tiffany R. \(CMS/OSORA\)](#); [Laib, Eric C. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#); [Miller, Ruth A. \(CMS/OSORA\)](#); [Phan, Thomas M. \(CMS/OSORA\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Subject: EOP Passback: Medicaid Provider Payment Reassignment NPRM
Date: Monday, June 18, 2018 5:51:11 PM
Attachments: [CMS-2413-P Master \(06-14-19\) 06182018 passback.docx](#)
Importance: High

EOP's passback is attached.

(b)(5)

(b)(5)

(b)(5) OGC has until COB tomorrow to submit their comments on the draft currently in clearance.

DOJ did not have any comments on this version.

Page 578 redacted for the following reason:

(b)(5), predecisional

Page 579 redacted for the following reason:

(b)(5), predecisional

Page 580 redacted for the following reason:

(b)(5), predecisional

Page 581 redacted for the following reason:

(b)(5), predecisional

Page 582 redacted for the following reason:

(b)(5), predecisional

Page 583 redacted for the following reason:

(b)(5), predecisional

Page 584 redacted for the following reason:

(b)(5), predecisional

Page 585 redacted for the following reason:

(b)(5), predecisional

Page 586 redacted for the following reason:

(b)(5), predecisional

Page 587 redacted for the following reason:

(b)(5), predecisional

Page 588 redacted for the following reason:

(b)(5), predecisional

Page 589 redacted for the following reason:

(b)(5), predecisional

Page 590 redacted for the following reason:

(b)(5), predecisional

Page 591 redacted for the following reason:

(b)(5), predecisional

Page 592 redacted for the following reason:

(b)(5), predecisional

Page 593 redacted for the following reason:

(b)(5), predecisional

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Barco, Evell J. \(CMS/OSORA\)](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#)
Subject: FW: EOP Passback: Medicaid Provider Payment Reassignment NPRM
Date: Tuesday, June 19, 2018 12:14:00 PM
Attachments: [CMS-2413-P Master \(06-14-19\) 06182018 passback.docx](#)
[CMS-2413-P Master \(06-14-19\) 06182018 passback - Clean Copy.docx](#)

FYI

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, June 19, 2018 12:14 PM
To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>
Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>
Subject: EOP Passback: Medicaid Provider Payment Reassignment NPRM

Hi Gaysha, Annette, and Cynthia,

(b)(5) Attached is a "tracked changes" and a "clean" version of the pass back. I understand we are awaiting comments from HHS/OGC. Please forward this iteration to HHS/OGC (b)(5)

Thank you,

Chris Thompson
Deputy Division Director

Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: Barco, Evell J. (CMS/OSORA)
Sent: Monday, June 18, 2018 5:51 PM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: EOP Passback: Medicaid Provider Payment Reassignment NPRM
Importance: High

EOP's passback is attached.

(b)(5)

(b)(5)

OGC has until COB tomorrow to submit their comments on the draft currently in clearance.

DOJ did not have any comments on this version.

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Lynch, Calder \(CMS/OA\)](#)
Cc: [Fan, Kristin A. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#); [Hill, Timothy B. \(CMS/CMCS\)](#); [Gifford, Deidre S. \(CMS/CMCS\)](#)
Subject: FW: OGC Comments : Medicaid Provider Payment Reassignment NPRM
Date: Wednesday, June 20, 2018 2:12:00 PM
Attachments: [CMS-2413-P Master \(06202018\) EOP- OGC passback - Clean Copy.docx](#)
Importance: High

Good Afternoon Calder,

(b)(5)

Please advise as far as next steps.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Barco, Evell J. (CMS/OSORA)
Sent: Wednesday, June 20, 2018 10:10 AM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA)

<Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: OGC Comments : Medicaid Provider Payment Reassignment NPRM

Importance: High

OGC Comments are attached.

A note from OS/ES regarding the EOP comments:

I heard back from Kelly; she is booked solid again today.

(b)(5)

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Fan, Kristin A. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#)
Cc: [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#)
Subject: FW: OGC Comments : Medicaid Provider Payment Reassignment NPRM
Date: Wednesday, June 20, 2018 12:25:00 PM
Attachments: [CMS-2413-P Master \(06202018\) EOP- OGC passback - Clean Copy.docx](#)
[CMS-2413-P Master \(06202018\) EOP- OGC passback.docx](#)
Importance: High

Hi Kristin,

(b)(5) Attached is "tracked changes" and a "clean" version of the NPRM (b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Barco, Evell J. (CMS/OSORA)
Sent: Wednesday, June 20, 2018 10:10 AM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA)

<Ruth.Miller@cms.hhs.gov>; Phan, Thomas M.(CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: OGC Comments : Medicaid Provider Payment Reassignment NPRM

Importance: High

OGC Comments are attached.

A note from OS/ES regarding the EOP comments:

I heard back from Kelly; she is booked solid again today.

(b)(5)

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Brooks, Gaysha M. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#); [Brewer, Annette M. \(CMS/OSORA\)](#)
Cc: [Boston, Beverly A. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Subject: FW: OGC Comments : Medicaid Provider Payment Reassignment NPRM
Date: Monday, June 25, 2018 1:37:00 PM
Attachments: [CMS-2413-P Master \(06202018\) EOP- OGC passback - Clean Copy.docx](#)
Importance: High

Hi Gaysha, Cynthia, and Annette,

I am trying to get a sense of when the roll-out for this proposed rule will occur. Do you all know if it will occur this Wednesday?

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: Fan, Kristin A. (CMS/CMCS)
Sent: Friday, June 22, 2018 10:10 AM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>
Cc: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Harshman, Sara (CMS/OL) <Sara.Harshman@cms.hhs.gov>; Mack, Rosa (CMS/CMCS) <Rosa.Mack@cms.hhs.gov>
Subject: FW: OGC Comments : Medicaid Provider Payment Reassignment NPRM
Importance: High

We spoke with Tim and Calder this morning. CMCS is fine with the edits and it is cleared to move forward for official signatures. Please let me know if there are any outstanding questions. We are preparing Qs/As and fact sheet if needed. It appears that they may want this ready to release on Wednesday (or at least display) to be linked to the Medicaid Program Integrity Strategy on

Wednesday.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, June 20, 2018 2:12 PM
To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>
Subject: FW: OGC Comments : Medicaid Provider Payment Reassignment NPRM
Importance: High

Good Afternoon Calder,

(b)(5)

Please advise as far as next steps.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Barco, Evell J. (CMS/OSORA)

Sent: Wednesday, June 20, 2018 10:10 AM

To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>

Subject: OGC Comments : Medicaid Provider Payment Reassignment NPRM

Importance: High

OGC Comments are attached.

A note from OS/ES regarding the EOP comments:

I heard back from Kelly; she is booked solid again today.

(b)(5)

From: [Fan, Kristin A. \(CMS/CMCS\)](#)
To: [Barco, Evell J. \(CMS/OSORA\)](#)
Cc: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#); [Harshman, Sara \(CMS/OL\)](#); [Mack, Rosa \(CMS/CMCS\)](#)
Subject: FW: OGC Comments : Medicaid Provider Payment Reassignment NPRM
Date: Friday, June 22, 2018 10:10:06 AM
Attachments: [CMS-2413-P Master \(06202018\) EOP- OGC passback - Clean Copy.docx](#)
Importance: High

We spoke with Tim and Calder this morning. CMCS is fine with the edits and it is cleared to move forward for official signatures. Please let me know if there are any outstanding questions. We are preparing Qs/As and fact sheet if needed. It appears that they may want this ready to release on Wednesday (or at least display) to be linked to the Medicaid Program Integrity Strategy on Wednesday.

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Wednesday, June 20, 2018 2:12 PM
To: Lynch, Calder (CMS/OA) <Calder.Lynch@cms.hhs.gov>
Cc: Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Hill, Timothy B. (CMS/CMCS) <timothy.hill@cms.hhs.gov>; Gifford, Deidre S. (CMS/CMCS) <Deidre.Gifford@cms.hhs.gov>
Subject: FW: OGC Comments : Medicaid Provider Payment Reassignment NPRM
Importance: High

Good Afternoon Calder,

(b)(5)

Please advise as far as next steps.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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From: Barco, Evell J. (CMS/OSORA)
Sent: Wednesday, June 20, 2018 10:10 AM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: OGC Comments : Medicaid Provider Payment Reassignment NPRM
Importance: High

OGC Comments are attached.

A note from OS/ES regarding the EOP comments:

I heard back from Kelly; she is booked solid again today.

(b)(5)

From: [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#)
To: [Thompson, Christopher C. \(CMS/CMCS\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#)
Cc: [Brooks, Gaysha M. \(CMS/OSORA\)](#); [Brewer, Annette M. \(CMS/OSORA\)](#)
Subject: FW: OMB passback-: Provider Payment Reassignment (-CMS-2413-P)
Date: Thursday, May 31, 2018 12:32:24 PM
Attachments: [CMS-2413-P Master \(05-15-18\) Passback 05232018 - Tracked Changes.docx](#)
[CMS-2413-P Master \(05-15-18\) Passback 05232018 - Clean.docx](#)

Chris,

I do not see any responses to DOJ comments—see DOJ comments below in Evell's email (highlighted).

Also, when can we expect to receive CMCS revisions based on comments from OGC, DOJ and OMB?

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Thursday, May 24, 2018 5:19 PM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Freeze, Janet G. (CMS/CMCS) <Janet.Freeze@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>
Subject: RE: OMB passback-: Provider Payment Reassignment (-CMS-2413-P)

Hi Evell,

Attached is the passback that incorporates both DOJ's and OMB's edits.

Thank you and have a good holiday weekend,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
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may result in prosecution to the full extent of the law.

From: Barco, Evell J. (CMS/OSORA)

Sent: Wednesday, May 23, 2018 11:09 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>

Cc: Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Khan, Farooq A. (CMS/OSORA) <Farooq.Khan@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Cavanaugh, Alicia A. (CMS/OSORA) <Alicia.Cavanaugh@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>

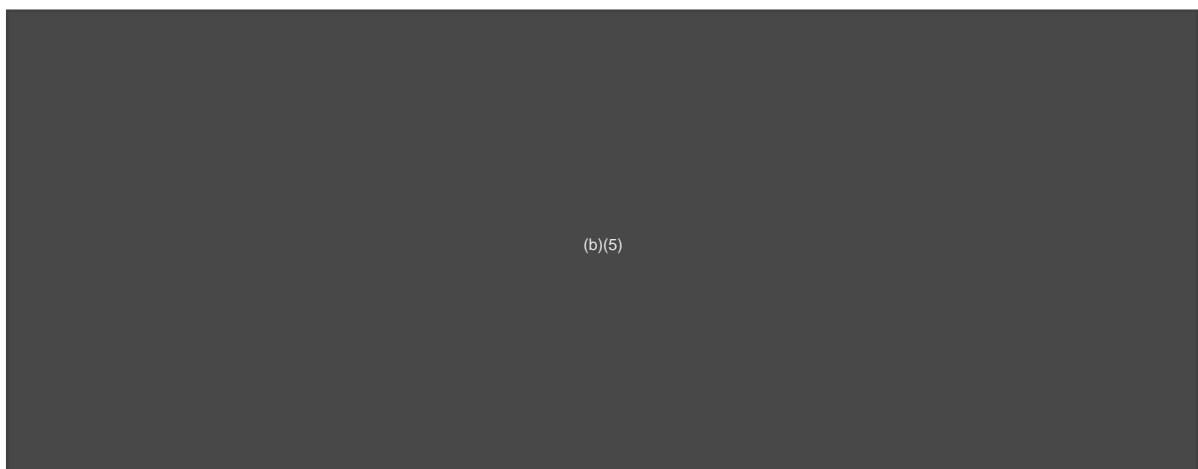
Subject: DOJ Comments: Provider Payment Reassignment (-CMS-2413-P)

Hello all,

DOJ comments on the Medicaid provider payment reassignment rule are below. We should get a full EOP passback this week.

Thanks,

DOJ Comments



From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Lafferty, Tiffany R. \(CMS/OSORA\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#); [Brooks, Gaysha M. \(CMS/OSORA\)](#)
Cc: [Brewer, Annette M. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Hubbard, Lisa A. \(CMS/OSORA\)](#); [Freeze, Janet G. \(CMS/CMCS\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#)
Subject: RE: Provider Reassignment (2413-P) Final Rule
Date: Monday, October 22, 2018 4:42:00 PM
Attachments: [CMS-2413-Final Rule.doc](#)

Good Afternoon Gaysha and Tiffany,

The attached draft final rule is being submitted for clearance.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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Fax: (410) 786-8533

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From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Friday, October 19, 2018 3:31 PM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Chris, Just checking in to see if we can still expect your draft today. Thanks!

From: Thompson, Christopher C. (CMS/CMCS)
Sent: Tuesday, October 16, 2018 12:26 PM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Lafferty, Tiffany R.

(CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Tiffany,

We are still on track for the 10/19 date.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Boston, Beverly A. (CMS/CMCS)

Sent: Tuesday, October 16, 2018 12:22 PM

To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Thank you and Chris will let you know whether we're on track to meet the 10/19 date to OSORA.

Beverly

From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Tuesday, October 16, 2018 11:16 AM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Correct. OA understands that November will be a challenge, but they want to start there and see what HHS/OMB will agree to once we're ready to share with them for clearance.

From: Boston, Beverly A. (CMS/CMCS)
Sent: Tuesday, October 16, 2018 10:37 AM
To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Tiffany,

So the expedited schedule will be based on OA's November date correct? I know that depends on whether OMB will agree to a shorter review timeframe.

Beverly

From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Tuesday, October 16, 2018 9:28 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard,

Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Good morning Chris, We don't have a firm schedule, but I do have some timeframes. The latest that I have heard is that the final rule will indicate a January publication target on the upcoming fall Unified Agenda, but OA has asked us to continue to target November TBD. We heard from Calder that we can expect your draft by 10/19. Please let us know if that changes.

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, October 15, 2018 10:41 AM

To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Tiffany,

I wanted circle back to you to see if there has been any movement as far as the regulation schedule?

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

Phone: (410)786-4044

Mobile: (b)(6)

Fax: (410) 786-8533

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From: Lafferty, Tiffany R. (CMS/OSORA)

Sent: Tuesday, September 18, 2018 10:45 AM

To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA)

<Gaysha.Brooks@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Beverly, We're pending a response from Brady Brookes in OA on what the target date should be.

(b)(5)

Once OA confirms direction for the target, we can develop the schedule.

Tiffany

From: Boston, Beverly A. (CMS/CMCS)

Sent: Tuesday, September 18, 2018 10:17 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Good morning,

Looping Tiffany, wanted to mention that the Administrator requested that we put this item back on this Thursday's Issues agenda although she was briefed on 9/5-- we believe she wants to know the timeframe to publish in final. We meet with our Center Directors tomorrow at 1pm and a new timeline reflecting a 10/31 (or late October) date to OSORA would be helpful.

Thanks

Beverly

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, September 17, 2018 5:11 PM

To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Gaysha,

We wanted to present a revised timeline to OCD this week. Can the timeline be revised to accommodate a 10/31/18 date to submit the rule to OSORA?

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Lafferty, Tiffany R. (CMS/OSORA)

Sent: Friday, October 19, 2018 3:31 PM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Chris, Just checking in to see if we can still expect your draft today. Thanks!

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Tuesday, October 16, 2018 12:26 PM

To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Tiffany,

We are still on track for the 10/19 date.

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
Phone: (410)786-4044
Mobile: (b)(6)
Fax: (410) 786-8533

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From: Boston, Beverly A. (CMS/CMCS)
Sent: Tuesday, October 16, 2018 12:22 PM
To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Thank you and Chris will let you know whether we're on track to meet the 10/19 date to OSORA.

Beverly

From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Tuesday, October 16, 2018 11:16 AM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Correct. OA understands that November will be a challenge, but they want to start there and see what HHS/OMB will agree to once we're ready to share with them for clearance.

From: Boston, Beverly A. (CMS/CMCS)

Sent: Tuesday, October 16, 2018 10:37 AM

To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Tiffany,

So the expedited schedule will be based on OA's November date correct?

(b)(5)

(b)(5)

Beverly

From: Lafferty, Tiffany R. (CMS/OSORA)

Sent: Tuesday, October 16, 2018 9:28 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Good morning Chris, We don't have a firm schedule, but I do have some timeframes. The latest that I have heard is that the final rule will indicate a January publication target on the upcoming fall Unified Agenda, but OA has asked us to continue to target November TBD. We heard from Calder that we can expect your draft by 10/19. Please let us know if that changes.

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, October 15, 2018 10:41 AM

To: Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Tiffany,

I wanted circle back to you to see if there has been any movement as far as the regulation schedule?

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Lafferty, Tiffany R. (CMS/OSORA)
Sent: Tuesday, September 18, 2018 10:45 AM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>
Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Beverly, We're pending a response from Brady Brookes in OA on what the target date should be.

(b)(5)

Once OA confirms direction for the target, we can develop the schedule.

Tiffany

From: Boston, Beverly A. (CMS/CMCS)
Sent: Tuesday, September 18, 2018 10:17 AM
To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>
Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS)

<Jeremy.Silanskis@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Good morning,

Looping Tiffany, wanted to mention that the Administrator requested that we put this item back on this Thursday's Issues agenda although she was briefed on 9/5-- we believe she wants to know the timeframe to publish in final. We meet with our Center Directors tomorrow at 1pm and a new timeline reflecting a 10/31 (or late October) date to OSORA would be helpful.

Thanks

Beverly

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Monday, September 17, 2018 5:11 PM

To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>

Cc: Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>

Subject: RE: Provider Reassignment (2413-P) Final Rule Template the final rule

Hi Gaysha,

We wanted to present a revised timeline to OCD this week. Can the timeline be revised to accommodate a 10/31/18 date to submit the rule to OSORA?

Thank you,

Chris Thompson

Deputy Division Director

Division of Reimbursement & State Financing

Center for Medicaid and CHIP Services

Centers for Medicare & Medicaid Services

7500 Security Blvd., Mail Stop S3-14-28

Baltimore, MD 21244

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From: [Farrell, Caroline \(HHS/OGC\)](#)
To: [Barco, Evell J. \(CMS/OSORA\)](#); [Thompson, Christopher C. \(CMS/CMCS\)](#)
Cc: [Popp, Dawn \(HHS/OGC\)](#)
Subject: RE: OGC Comments : Medicaid Provider Payment Reassignment NPRM
Date: Wednesday, June 20, 2018 10:15:00 AM
Attachments: [00394120 OGC NOTE 20180619 18-15771.pdf](#)
[00394120 CMS-2413-P Master OGC MARKUP 20180619 18-15771.docx](#)
Importance: High

Good morning,

If CMS schedules a call on this rule, please include Dawn Popp, as I will be on leave for the next week and a half until COB on 6/29. Please include Dawn on all other correspondence about the rule during this time period as well.

Thank you,

Caroline L. Farrell
Attorney
Office of the General Counsel, CMS Division
United States Department of Health and Human Services
(202) 708 - 9735

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From: Barco, Evell J. (CMS/OSORA)
Sent: Wednesday, June 20, 2018 10:10 AM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Garcia, Vanessa (CMS/OSORA) <Vanessa.Garcia@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Lafferty, Tiffany R. (CMS/OSORA) <Tiffany.Lafferty@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>
Subject: OGC Comments : Medicaid Provider Payment Reassignment NPRM

Importance: High

OGC Comments are attached.

A note from OS/ES regarding the EOP comments:

I heard back from Kelly; she is booked solid again today.

(b)(5)

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Brooks, Gaysha M. \(CMS/OSORA\)](#); [Brewer, Annette M. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#)
Cc: [Barco, Evell J. \(CMS/OSORA\)](#); [Boston, Beverly A. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Bryman, Mitch \(CMS/OSORA\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#); [Farrell, Caroline \(HHS/OGC\)](#); [Fultz-Mimms, Trenesha N. \(CMS/OSORA\)](#); [Laib, Eric C. \(CMS/OSORA\)](#); [Brown, Sharon J. \(CMS/CMCS\)](#)
Subject: RE: OMB Passback - Reassignment of Medicaid Provider Claims (CMS 2413-P)--CLEARANCE REQUEST
Date: Tuesday, June 26, 2018 5:01:00 PM
Attachments: [CMS-2413-P Master \(6-26-18\) Clean Copy.docx](#)
[CMS-2413-P Master \(6-26-18\) passback.docx](#)

Hi Annette, Gaysha, and Cynthia,

I am perfectly okay with the minor edits made by OMB. Attached is a pass back with all of OMB edits accepted. Evell requested that this iteration of the proposed be transmitted to (b)(5). I will defer to you all as far as coordination to make certain (b)(5) is able to review this iteration of the proposed rule.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Barco, Evell J. (CMS/OSORA)
Sent: Tuesday, June 26, 2018 4:32 PM
To: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS)

<Christopher.Thompson@cms.hhs.gov>

Cc: Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>; Hubbard, Lisa A. (CMS/OSORA) <Lisa.Hubbard@cms.hhs.gov>; Harris, Sheli E. (CMS/OSORA) <Sheli.Harris@cms.hhs.gov>; Clybourn, Olen D. (CMS/OSORA) <Olen.Clybourn@cms.hhs.gov>; Phan, Thomas M. (CMS/OSORA) <Thomas.Phan@cms.hhs.gov>; Miller, Ruth A. (CMS/OSORA) <Ruth.Miller@cms.hhs.gov>

Subject: OMB Passback - Reassignment of Medicaid Provider Claims (CMS 2413-P)--CLEARANCE REQUEST

Importance: High

Hi,

OMB's passback is attached, with one reviewer outstanding so possibly more to come. These

(b)(5)

Please transmit this to

(b)(5)

Thanks.

From: [Thompson, Christopher C. \(CMS/CMCS\)](#)
To: [Brewer, Annette M. \(CMS/OSORA\)](#); [Barco, Evell J. \(CMS/OSORA\)](#); [Popp, Dawn \(HHS/OGC\)](#)
Cc: [Boston, Beverly A. \(CMS/CMCS\)](#); [Silanskis, Jeremy D. \(CMS/CMCS\)](#); [Bryman, Mitch \(CMS/OSORA\)](#); [Fan, Kristin A. \(CMS/CMCS\)](#); [Farrell, Caroline \(HHS/OGC\)](#); [Fultz-Mimms, Trenesha N. \(CMS/OSORA\)](#); [Laib, Eric C. \(CMS/OSORA\)](#); [Brown, Sharon J. \(CMS/CMCS\)](#); [Popp, Dawn \(HHS/OGC\)](#); [Brooks, Gaysha M. \(CMS/OSORA\)](#); [Lambert-Lawson, Cynthia \(CMS/OSORA\)](#); [Jones, Martique S. \(CMS/OSORA\)](#); [Mack, Rosa \(CMS/CMCS\)](#)
Subject: RE: Reassignment of Medicaid Provider Claims (CMS 2413-P)--CLEARANCE REQUEST
Date: Wednesday, June 27, 2018 11:20:00 AM
Attachments: [Re Provider Reassignment Next Steps.msg](#)

Hi Annette,

(b)(5)

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
7500 Security Blvd., Mail Stop S3-14-28
Baltimore, MD 21244
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From: Brewer, Annette M. (CMS/OSORA)
Sent: Wednesday, June 27, 2018 10:06 AM
To: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>
Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>; Jones, Martique S. (CMS/OSORA) <Martique.Jones@cms.hhs.gov>
Subject: RE: Reassignment of Medicaid Provider Claims (CMS 2413-P)--CLEARANCE REQUEST

Chris,

(b)(5)

Annette M. Brewer 



410-786-6580 /

(b)(6)

ADS on Mondays

From: Barco, Evell J. (CMS/OSORA)

Sent: Wednesday, June 27, 2018 8:58 AM

To: Thompson, Christopher C. (CMS/CMCS) <Christopher.Thompson@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>

Cc: Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>; Popp, Dawn (HHS/OGC) <Dawn.Popp@hhs.gov>; Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Subject: Reassignment of Medicaid Provider Claims (CMS 2413-P)--CLEARANCE REQUEST

(b)(5)

Please let me know. Thanks.

From: Thompson, Christopher C. (CMS/CMCS)

Sent: Tuesday, June 26, 2018 5:02 PM

To: Brooks, Gaysha M. (CMS/OSORA) <Gaysha.Brooks@cms.hhs.gov>; Brewer, Annette M. (CMS/OSORA) <Annette.Brewer@cms.hhs.gov>; Lambert-Lawson, Cynthia (CMS/OSORA) <Cynthia.Lambert-Lawson@cms.hhs.gov>

Cc: Barco, Evell J. (CMS/OSORA) <Evell.Barco@cms.hhs.gov>; Boston, Beverly A. (CMS/CMCS) <Beverly.Boston@cms.hhs.gov>; Silanskis, Jeremy D. (CMS/CMCS) <Jeremy.Silanskis@cms.hhs.gov>; Bryman, Mitch (CMS/OSORA) <Mitch.Bryman@cms.hhs.gov>; Fan, Kristin A. (CMS/CMCS) <Kristin.Fan@cms.hhs.gov>; Farrell, Caroline (HHS/OGC) <Caroline.Farrell@hhs.gov>; Fultz-Mimms, Trenesha N. (CMS/OSORA) <trenesha.fultzmimms@cms.hhs.gov>; Laib, Eric C. (CMS/OSORA) <Eric.Laib2@cms.hhs.gov>; Brown, Sharon J. (CMS/CMCS) <Sharon.Brown@cms.hhs.gov>

Subject: RE: OMB Passback - Reassignment of Medicaid Provider Claims (CMS 2413-P)--CLEARANCE REQUEST

Hi Annette, Gaysha, and Cynthia,

I am perfectly okay with the minor edits made by OMB. Attached is a pass back with all of OMB edits

accepted. Evell requested that this iteration of the proposed be transmitted to Kelly Cleary. I will defer to you all as far as coordination to make certain Kelly Cleary is able to review this iteration of the proposed rule.

Thank you,

Chris Thompson
Deputy Division Director
Division of Reimbursement & State Financing
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services
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From: Barco, Evell J. (CMS/OSORA)
Sent: Tuesday, June 26, 2018 4:32 PM
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Subject: OMB Passback - Reassignment of Medicaid Provider Claims (CMS 2413-P)--CLEARANCE REQUEST
Importance: High

Hi,

OMB's passback is attached, with one reviewer outstanding so possibly more to come. These

(b)(5)

lease transmit this to (b)(5) Thanks.